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ABSTRACT

The dissertation presents a plan for the compliance of William Rainey Harper College with Section 504 of the Rehabilitation Act of 1973. Chapter 1 discusses the background and significance of the plan and identifies major issues (such as the institution's commitment to nondiscrimination of the handicapped), defines terms, and cites limitations and assumptions. Chapter 2 reviews the related literature on institutional accessibility. In Chapter 3 the procedures for implementation are outlined including notification of program accessibility, the transition plan, self evaluation methodology, a summary of implementation, and a community evaluation. Findings and recommendations are detailed in Chapter 4. Among findings listed are physical changes needed in areas such as stairwells and door openings. Over two-thirds of the document consists of a bibliography and appendixes including a copy of the transition plan, and information on the self evaluation and community evaluation procedures. (PHB)

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The Development of a Plan for Institutional Compliance With Section 504 of the Rehabilitation Act of 1973

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Elizabeth R. McKay

A MAJOR APPLIED RESEARCH PROJECT
PRESENTED IN PARTIAL FULFILLMENT OF THE REQUIREMENTS FOR
THE DEGREE OF DOCTOR OF EDUCATION

NOVA UNIVERSITY

1978

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January 3, 1978

Ross E. Moreton
Associate Director
Center for Higher Education
Nova University
3301 College Avenue
Fort Lauderdale, Florida 33314

Dear Dr. Moreton,

As we discussed, I am sending the items you have requested to evaluate some of my contacts with Nova University as well as that material requested for the final MARP submission. These are as follows:

1. Expectations for Nova Support Units
2. Module Evaluations
3. Practicum Summaries
4. Original copy of MARP
5. Signed original MARP signature page
6. Check for $15.00 payable to Nova University

Please contact me if there are any additional items necessary to complete the requirements for my degree. I look forward to hearing from Nova when degree requirements have been fulfilled.

Sincerely,

Elizabeth R. McKay

jl

I certify that I have read and am willing to sponsor this Major Applied Research Project submitted by Elizabeth R. McKay. In my opinion it conforms to acceptable standards and is fully adequate in scope and quality, as a Major Applied Research Project for the degree of Doctor of Education at Nova University.

11-28-78
(date)

John E. Roueche
John E. Roueche
MARP Advisor

I certify that I have read this Major Applied Research Project and in my opinion it conforms to acceptable standards for a Major Applied Research Project for the degree of Doctor of Education at Nova University.

12-7-78
(date)

Guerin A. Fischer
Guerin A. Fischer
Local Professional

This Major Applied Research Project was submitted to the Central Staff of the Nova University Ed.D. Program for Community College Faculty and is acceptable as partial fulfillment of the requirements for the degree of Doctor of Education.

Dec 18, 1978
(date)

Eugene E. DuBois
Eugene E. DuBois
Central Staff Committee Member

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Appreciation is expressed to all the handicapped persons who were the "teachers" as this project was conceived. To Angela, Bill, John, Mike, Lucy and many, many more. By your inspiration this plan will help Harper College be a better place for all persons.

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Abstract of a Major Applied Research Project Presented to Nova University in Partial Fulfillment of the Requirements for the Degree of Doctor of Education

THE DEVELOPMENT OF A PLAN FOR INSTITUTIONAL COMPLIANCE WITH SECTION 504 OF THE REHABILITATION ACT OF 1973

By

Elizabeth R. McKay

December, 1978

William Rainey Harper College enrolled twenty thousand students during the 1977-78 academic year. According to national statistics one out of every ten persons has been identified as having some type of disability. This would give the college a possible enrollment of two thousand disabled persons. Harper has attempted to serve the handicapped student during its brief ten year history, but a concerted effort had not been made to evaluate the total educational program before the development of this plan.

With the advent of Section 504 of the Rehabilitation Act of 1973 which stated that, "No otherwise qualified handicapped individual in the United States... shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination

under any program or activity receiving Federal financial assistance," the college found itself mandated to comply with the legislation. This Public Law meant that Harper College as well as all other post-secondary institutions receiving Federal monies, must develop an institutional compliance plan. The primary purposes of this study were to develop the plan for instituional compliance, identify areas of non-compliance and make recommendations for future activity.

The term handicap as defined by Section 504 and used in this project included such diseases or conditions as speech, hearing, visual and orthopedic impairments, cerebral palsy, epilepsy, heart disease, mental retardation, emotional illness, and specific learning disabilities such as perceptual handicaps, dyslexia, minimal brain dysfunction and developmental aphasia. The plan was developed in an effort to evaluate what Harper was presently doing to meet the educational needs of the handicapped members of its district and to identify what future activities should be undertaken.

This evaluation had three components which included a review of the physical facilities, an analysis of the accessibility of the educational programs, and an evaluation of the plan by a community review panel. The architectural

evaluation of the total campus environment was completed by handicapped members of the student body and employees of the college and a transition plan for alterations was developed for 1977-1980. This plan was approved and funded by the Board of Trustees and implemented on the prescribed time table. Programmatic accessibility was studied by an institutional self-evaluation using the guide approved by the Office of Civil Rights of the Department of Health Education and Welfare. This involved many members of the college staff as all programs were analyzed for accessibility. Summary reports and implementation plans were also developed as a result of the self-evaluation of the educational programs. The third component of the plan was the evaluation of the institutional plan by a community review panel composed of handicapped persons and persons from organizations or agencies representing the handicapped.

Areas of non-compliance were identified and a schedule of activities was outlined to achieve institutional compliance. The plan was evaluated favorably by the community review panel and approved by the Harper Board of Trustees for implementation.

In addition, it was discussed that a needs analysis should be conducted by the college to determine the numbers of handicapped persons residing in the Harper district.by

specific handicap, so that future educational programs would be developed with an awareness of the needs of the handicapped. The development of this plan for institutional compliance has evaluated the accessibility of William Rainey Harper College and has provided recommendations for program development to better serve the handicapped citizens of District 512.

Chapter 1

INTRODUCTION

Background and Significance

William Rainey Harper, first president of the University of Chicago, initiated the concept of the community college in the year 1896. Dr. Harper encouraged school authorities in Joliet, Illinois to offer two years of class work beyond high school and Joliet Junior College was founded in 1902 as the first publicly supported junior college in the nation. From this small beginning has emerged the comprehensive community college as known today.

In Illinois the legislature enacted the Illinois Community College Act as part of the master plan for higher education. It specified that:

> "The two-year institutions admit all students qualified to complete any one of their programs, including general education, transfer, technical and terminal, as long as space for effective instruction is available. After entry, the colleges counsel and distribute the students among its programs according to their interests and abilities.
>
> The number and variety of technical and semi-technical programs leading directly to employment be greatly increased primarily through programs established in comprehensive junior colleges.
>
> The junior colleges develop and experiment with programs designed to aid the under-educated student of post-high school age to prepare as speedily as possible for transfer to senior institutions at the junior level or for entry directly into employment from technical and semi-technical programs." (Gleazer-1968)

Consistent with this Act, Illinois community colleges, and community colleges nationally, have established "open door" admissions policies. This has meant that all persons who have graduated from high school or who have completed the equivalent General Educational Development (GED) test have been admitted into the community college. Students of all races, ages, abilities, interests and socioeconomic backgrounds have chosen from several educational objectives: college transfer work, occupational and technical programs or general interest courses. (Roueche-1972)

Although this philosophy has enabled many persons to have access to post-secondary education, it has also brought students to the community college who are different than those that have traditionally enrolled. Dr. Cross's main premise in her book, Beyond The Open Door is that these post-secondary institutions are not prepared to educate these "new students" with differing needs who are currently pursuing higher education. (1971)

Roueche and Kirk, in their 1973 publication, also stated that helpful critics of the community college continue to needle the consciences of community college educators by reminding them that the open-door concept is not yet a reality. Gleazer also wrote that the greatest challenge facing the two-year college in the 1970's is that of making

good on its promise to provide a meaningful education for all. Roueche-1973)

As community colleges have struggled with the concept of the open door and have been concerned with building adequate facilities to meet burgeoning enrollments there has not been attention paid to increasing access to those persons who have not enrolled. Dorothy Knoell pointed out that the basic nature of community college planning for the next several decades should switch from the facilities emphasis of the sixties to an emphasis on increasing access. She also emphasized that attention should be given to provide access to the elderly, disadvantaged, handicapped and others who have not attended in significant numbers. (1974) These persons all have unique learning needs and must be accommodated in the community college if the "open door" is to be more than an admissions statement.

A number of groups exist with special physical problems of access and quite diverse needs and problems whom community colleges have tended to neglect until recently. The physically handicapped are spread through the college service area, often living very marginally as a result of their lack of opportunity for education for employment. (Knoell-1974)

Handicapped members of our nation have been denied

access to many opportunities open to the general population because of their physical differences. Educational opportunities have also been included in this and these persons have been unable to routinely develop the skills identified by Cross as necessary, not only to occupations, but to life in our society. She stated that these three skills are obtaining specific knowledge, developing interpersonal skills and having the ability to work with objects and materials. (1976) The community colleges have been charged with providing access for all and the handicapped must also be allowed through the "open door". In a study reported by Roueche and Snow, 98.6% of the nations community colleges claimed to have an open-door policy. (1977) The community colleges have also been mandated by law to allow the physically handicapped access to their institutions or face the possible loss of federal monies. This piece of legislation was enacted after many years of struggle by handicapped persons for equal opportunity.

On April 28, 1977 Joseph A. Califano, Jr., Secretary of Health, Education and Welfare, issued the final Section 504 regulation of the Rehabilitation Act of 1973. Section 504 stated that: "No otherwise qualified handicapped individual in the United States... shall, solely by reason of his handicap, be excluded from the participation in, be

denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." This legislation included all recipients of funds from HEW and affected elementary and secondary schools and colleges. (United States Department of Health, Education and Welfare, 1977) William Rainey Harper College, a post-secondary institution receiving Federal monies to suppliment its educational fund, has been charged to comply with Section 504 or lose Federal monetary assistance. Harper College has stated in its bulletin that its programs and facilities are accessible to handicapped persons. (1978)

Compliance with Section 504 required Harper College, as well as other post-secondary institutions, to develop an institutional plan for the implementation of the legislation. The primary objective of this Major Applied Research Project, (MARP) was to develop the compliance plan for the college to assure the institution of continued Federal assistance. The writer's supervisors; the Dean of Student Services and the President of the college, gave their full support to the project. In addition, the Board of Trustees of William Rainey Harper College also granted the author a two month administrative leave at full pay to begin work on the plan, thus demonstrating the significance of this MARP to the institution.

The Rehabilitation Act of 1973, and specifically Section 504, has mandated specific responsibilities for all recipients of Federal funds. Community colleges have been included in this compliance and have felt the impact of the Act on their budgets and educational programming. With the threat of loss of Federal monies the colleges have been forced to remodel inaccessible physical facilities as well as to examine the educational programs to assure accessibility for qualified handicapped persons.

The term handicapped, as defined by Section 504, includes such diseases or conditions as speech, hearing, visual, and orthopedic impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, diabetes, heart disease, mental retardation, emotional illness, and specific learning disabilities such as perceptual handicaps, dyslexia, minimal brain dysfunction and developmental aphasia.

There have been two trends noted in the literature regarding program development. These were that there is a changing emphasis in the definition of "handicap" and that there is a growing acceptance of the concept of normalization. (Schworles-1977) These trends have been influential in providing services for the handicapped and in assisting the disabled in their career choice.

Disabled students, as other "new" students, have

demonstrated a need for counseling assistance in adjustments. Some of the identified areas were those of vocational selection, study skills, psychological and educational testing and the identification of educational objectives. (McGowan-1968)

Compliance with Section 504 has required colleges to be both architecturally and programatically accessible, and therefore all courses and programs must accommodate handicapped students. Fetter pointed out that an action plan for smooth procedure in class adaptation should be established, and that this should be coordinated by one person on the campus. She also outlined that course modifications and adaptation may be necessary and inclusive of changes in length of time for course completion, substitution of specific courses and adaptations in manner of instruction. (Fetter-1977) The literature pointed out that attitudes cannot be legislated but that educational programs should exist in a caring environment to be the most effective for all concerned.

For the most part, post-secondary educational programs that have served handicapped persons in the past have been segregated according to handicap. Gallaudet College, Washington, D.C., was established as the first liberal arts college for the deaf, and the National Training Institute

for the Deaf in Rochester, New York, was established as its corollary in vocational education. Other institutions have established handicapped services and programs, but there has never been an emphasis on institutional accessibility for all as seen since the advent of Section 504.

Seventy-five percent of all post-secondary occupational education has taken place in the community college, and support services for the handicapped must be found in these institutions. (Schworles-1976) The handicapped have been found in the new student clientele enrolling in the community college and the institutions have been mandated by law to meet their needs.

Fox and Tuscher (1971) stated that any institution where barriers to handicapped people remain unmodified has no right to claim itself as an open-door institution. This indictment was made six years before the enactment of Section 504 in 1977 and should have served as a warning to many community colleges whose architecture and programs were not accessible.

The Massachusetts community colleges have developed a resource guide for accommodating students with physical disabilities. Foster identified the admissions procedures and the liaison with instructors to promote academic adjustments as extremely important in the success of the handi-

capped. (Foster-1975)

Fix candidly remarked that the student with physical limitations has yet to be served adequately by the community college, and that the biggest barrier to self-actualization was the attitude of others toward the handicapped. (Fix-1977) That the physically handicapped need total accessibility to the community college system has been strongly promoted by Thomas Schworles in his advocacy of the community college as a resource for rehabilitation. (1976) He stated as many others that barriers to the disabled are many including ones of architectural, social, psychological, and economic natures. Efforts have been made to eliminate these barriers and stereotypes through interaction and maximum use of all resources through mainstreaming. The concerned educator will not cease until the ultimate goal of total elimination has been reached. (Schworles-1976)

Major Issues

The major issues that were dealt with in the development of the compliance plan were outlined in the legislation and are listed in the following four paragraphs:

An initial notification of the institution's commitment to non-discrimination according to handicap was written and circulated to the members of the college community. This action was necessary to inform all students, classified staff,

faculty, and administrators as well as the community at large that William Rainey Harper College does not discriminate against the handicapped and that in fact has facilities and programs accessible to these persons.

All physical facilities of the college were to be surveyed to determine changes that were necessary to achieve program accessibility. After the survey was completed, a transition plan was developed relative to the identified obstacles and a time frame for implementation over a three year period was established. This issue mandated the college to achieve architectural and programmatic accessibility by June 1980, and to adopt a specific implementation schedule.

The third major issue that was dealt with in this MARP was the self-evaluation of total college accessibility including all academic programs and policies. In the fulfillment of this issue the writer gathered data on academic programs, support services and student activities from all areas of the college and completed the self-evaluation in accord with the Guide to the Section 504 Self-Evaluation. published by the Office of Civil Rights. Implementation documents were also developed to achieve compliance and circulated for action by the appropriate administrator.

The final issue related to the survey of facilities and included the alteration of facilities to achieve

accessibility according to the structural changes included in the Transition Plan. This issue involved funding allocations by the Board of Trustees and monitoring of progress by the Section 504 Compliance Officer, Director of the Physical Plant and the writer. This MARP had addressed these four major issues and an institutional compliance plan was developed in accordance with Section 504 of the Rehabilitation Act of 1973.

Definition of Terms

Terms used in this study were defined by the legislation and were as follows:

1. Recipient - any state or its political subdivision, any instrumentatlity of a state or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended directly or through another recipient.

2. Federal financial assistance - any grant, loan, contract or any other arrangement by which the Department (HEW) provides or otherwise makes available assistance in the form of: (1) funds; (2) services of federal personnel; or (3) real and personal property or any interest in or use of such property.

3. Facility - all or any portion of buildings, structures, equipment, roads, walks, parking lots, or other real or personal property or interest in such property.

4. Handicapped person - someone who (1) has a physical or mental impairment which substantially limits one or more major life activities (functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working); (2) has a record of such an impairment (has a history of mental or physical impairment or has been misclassified as having such); or (3) is regarded as having such an impairment (has a physical or mental impairment that does not

substantially limit major life activities but is treated by a recipient as having such an impairment).

5. Physical or mental impairment - any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic or lymphatic; skin; and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

6. Qualified handicapped person - someone who meets the academic and technical standards requisite to admission or participation in the recipient's education program or activity. (Federal Register - Title 45 - May 1977)

The preceding definitions were used as the writer gathered information on the college, developed the plan and identified areas of concern for future implementation.

Assumptions and Limitations

As this project was initiated through Federal legislation the writer assumed that this project had the support of the college. It was also assumed that this MARP will improve educational practice at Harper College and will also provide a guide for further compliance efforts and program analysis as well as identifying what the College is presently doing for the handicapped members of its district.

Limitations that were identified were related to the information that was requested from the many persons on the Harper staff. The thoroughness of the self-evaluation portion of the plan was directly related to the individuals

who reviewed their respective programs. The writer did not assume the responsibility of evaluating each program requested by the legislation but relied on each administrator to report on the person's area of responsibility.

Another limitation which was identified was that each reporter's acceptance and understanding of handicapped persons was assumed to be different and this may have accounted for differences in identified actions for future implementation. The writer attempted to accommodate these differences through individual discussions with the individuals as needed.

This MARP has illustrated what William Rainey Harper College has done in the development of its Section 504 institutional compliance plan and has outlined what it needs to do to both comply with Section 504 and in doing so to further develop its services to the handicapped. The following chapter has described the background literature as related to educational program development for the handicapped and has identified barriers and problems encountered in achieving accessibility.

Chapter 2
REVIEW OF RELATED LITERATURE

America has handicapped disabled people and thus has handicapped America. When all citizens have realized that by freeing abilities from the shackles of disabilities, not only disabled people but America itself will have been rehabilitated. Thus wrote Frank B. Bowe, Director of the American Coalition of Citizens with Disabilities, in his book, Handicapping America--Barriers to Disabled People. (1978) As the writer thought about this premise, this review of literature was organized around barriers to the handicapped and methods utilized to overcome these problems to achieve success.

This chapter was developed by reviewing literature describing handicapped persons in general, the resultant legislation, barriers to accessibility and ensuing problems and achievements.

Thirty-six million disabled Americans was the most widely quoted estimate found in the literature with a prediction that the physically disabled may total more than forty million by 1985. (Barrier-Free-1976) These numbers were translated to mean that today one out of every ten persons has some disability which prevents them from using

environments designed for the physically fit. These statistics also represented human resources of inestimable value and of great economic significance to the entire nation. (American Standard-1961) Specifically in Illinois, the Capital Development Board has stated that because of the population and the nature of both agricultural and industrial enterprises in the State, we might logically have a higher percentage of individuals with physical disabilities of all causes and manifestations and very significant number of individuals confined to wheelchairs all or part of the time. (1968)

What then are the nation's leaders doing about this problem? Jimmy Carter, President of the United States, in his address to the White House Conference on Handicapped Individuals in May 1977 stated that "It would be a mistake for the rest of America to think that the benefits are only going to the handicapped, because when you get freedom, we share that freedom, and when the handicapped get the benefits of education and a job and a purposeful life, we all share in the benefits of that education, that job and a purposeful life." (White House-1977-p.1)

This conference was held after the signing of Section 504 and Secretary Joseph Califano of the Department of Health, Education and Welfare echoed President Carter's remark when

he said that "Section 504 and the 504 Regulation constitute a striking recognition of the Civil Rights of America's handicapped citizens, just as Title VI of the Civil Rights Art of 1964 and Title IX of the Education Amendments of 1972, and their companion regulations are critical elements in the structure of law protecting the civil rights of racial minorities and women." (White House-1977-p.103) Time magazine also supported this when it stated that the Rehabilitation Act was long overdue when passed and although it is a costly measure for all taxpayers it is a potentially great boon to the millions of handicapped persons in the United States. (December 5 1977)

Handicapped persons today have moved from being an invisible minority group to being a visible and vocal one. But the underlying problem that the writer found preventing the handicapped from having equal opportunity in our society was the negative attitudes that the able-bodied hold toward the handicapped. Dr. Henry Betts of the Rehabilitation Institute of Chicago described the origin of the problem in this manner, "The handicapped have a problem other minority groups don't have: a handicap can happen to anybody. That's a very shattering reminder to the able-bodied. It's particularly devastating in our present society, which puts so much emphasis on activity and beauty and conformity." (Lewis-1978)

This threat to one's own body and self concept has spawned many emotions, for attitudes toward disabilities have been found to be a curious amalgm of fear and ignorance, optimism and loathing. They were also discovered to be complex and diverse reflecting our own differences in background and perception, situational constraints, societal expectations and variations among disabled people themselves. (Bowe-1978)

These elements all were found to have an impact on the need for America to recognize that handicapped persons are equal and to act accordingly. The handicapped have been subject throughout the years to many barriers and have not been allowed the same access to their environments enjoyed by their able-bodied peers. They have been handicapped in mobility or functioning as a result of obstacles put in the way by the design of a building, the choice of hardware and equipment and the arrangement of outside spaces. (Kliment-1975) These persons may have been subjected to this treatment from childhood, and research has shown that a child's ability to cope with his physical environment has a great bearing on the child's social and personal development. (Baas-1972) In addition, Joseph Deacon has also pointed out that human beings, including the mentally handicapped, may well become only what is expected of them by those

around. (1974)

As the literature was further explored, it was often pointed out that the environmental emphasis has an impact on the self-concept of handicapped persons with impairments who have a natural right to the same growth-giving environment as the able-bodied. (Schworles-1977) This was often denied the handicapped as obstacles prevent their moving freely in their world. All of these statements pointed toward the goal of independence for these persons with the goal of getting the person more physically, psychologically and socially independent and into the mainstream with everyone else. (Downing-1975)

And accessibility was found to be more than the removal of architectural barriers and to include also the need for awareness of and sensitivity to special needs. (Enabling-1976) But barriers have been placed in the way of our nation's handicapped. These have occurred both unconsciously and consciously, but no matter how they happened the fact is that they do exist and impede the handicapped. Frank Bowe placed them in six categories: architectural, attitudinal, educational, occupational, legal and personal. (1978) It was the writer's thinking both from reviewing the literature and from personal experience that attitudinal barriers underlie and influence all others.

Dubrow defined prejudice as "an injury due to some judgement or action of another, as in disregard of a person's rights". He went on to state that all are prejudiced as far as the disabled are concerned and this is carried out in the "survival of the fittest" philosphy. (1965) These values, principles, governing behavior and biases are often learned indirectly and largely unknowingly. The condition of the environment was found to be an important factor in shaping views and attitudes that the general public forms about people with disabilities. (Pimental-1977) He also went on to say that young people constitute the best opportunity to correct many attitudinal problems regarding citizens with disabilities. (1977) Yuker described attitudes toward handicapped people in general as follows:

1. "Fifty percent of the United States population express slightly positive attitudes and indicate sympathetic feelings toward handicapped.

2. Most people perceive handicapped as different and inferior and don't know how to behave around them.

3. Handicapped are often discriminated against and segregated from society.

4. Attitudes often have negative aspects relating to the fear of becoming handicapped.

5. Differences in attitudes are largely a result of people's experience and knowledge" (1977)

Comer also emphasized that attitudinal barriers exist that

must be dealt with and reiterated that the handicapped are a group that any of us can become part of tomorrow. (1978) Many young men have found this out through their experience in the military and a resulting handicap. The stereotyped thinking, misconceptions and myths have all become real handicaps for the nation's disabled veterans. (Cleland-1978) These attitudinal barriers were found to have a direct influence on other barriers and the second barrier to be discussed is architectural in nature.

Jay Jorgenson in his book Landscape Design for the Disabled summed it up well when he stated that through the lack of social education, awareness or just plain unconcern the designers who shape our environment have not provided one that is usable by all Americans. He went on to state that it's a fact that everyone is handicapped, inhibited or restricted in their activities at sometime during their life. The planning of a functional, usable environment involves not only design for the able-bodied person but also design for those who are physically or mentally disabled in some way. (1975) This has resulted in our nation's buildings being built for the "average man" without consideration of the handicapped. (Chatelain-1966) The end product of this was that architectural barriers made it difficult to project the physically handicapped into normal situations of

education, recreation and employment. (Bartholomew-1976)

In 1968 the Facilities for the Handicapped Act was signed which stated that buildings of public accommodation must be built in a manner making them useable by the physically handicapped. Although the intent of the legislation was good, the Act was little known, rarely employed and virtually unenforceable. (Christman-1974) The inaction on this legislation as well as the fact that there are many modifications that can be made that are minor and low cost resulted in the intense lobbying effort of the handicapped in 1977 to assure the signing of Section 504 of the Rehabilitation Act of 1973. This law prohibits discrimination on the basis of physical or mental handicap in every Federally assisted program or activity in the country was passed by Congress in 1973. (U.S.-1977) Four years elapsed between the passage of this public law and when the legislation was actually signed giving handicapped persons rights that they had never before enjoyed. On April 28, 1977 Secretary Califano gave the following statement:

> "Today I am issuing a regulation, pursuant to Section 504 of the Rehabilitation Act of 1973, that will open a new world of equal opportunity for more than 35 million handicapped Americans--the blind, the deaf, persons confined to wheelchairs, the mentally ill or retarded, and those with other handicaps.

> "The 504 Regulation attacks the discrimination, the demeaning practices and the injustices that have afflicted the nation's handicapped citizens. It reflects the recognition of the Congress that most handicapped persons can lead proud and productive lives, despite their disabilities. It will usher in a new era of equality for handicapped individuals in which unfair barriers to self-sufficiency and decent treatment will begin to fall before the force of law." (U.S.-1977)

This legislation not only affected architectural accessibility, but total accessibility for any program receiving Federal funds. It also included post-secondary educational institutions and specifically for this literature review community colleges.

Obstacles have existed in educational institutions as well and Fasteau has outlined the following three that exist in the community college:

1. Architectural barriers.
2. Lack of opportunities to experience normal social development.
3. Educational lag due to absences from class. (1972)

These colleges have also been mandated to recognize and plan for individual groups with unique backgrounds and these include the handicapped. Here the community college has another opportunity to assist in the person's development to the fullest potential and to increase the true wealth of the nation. (Fasteau-1972)

Responsible factors for this have been society's

misconceptions concerning the role of the disabled person in the community and the inaccessible construction of campus buildings and facilities with its subsequent architectural barriers." (Stevens-1975)

Schworles stated that the physically handicapped need total accessibility to the community college system as it can and should be a viable vehicle in vocational rehabilitation with the ultimate goal being the elimination of stereotypes through interaction and maximum use of all resources. (1976) Here the community college's cooperative efforts with vocational education has combined facilities and resources for educational opportunities for the handicapped. (Eads-1975)

But here again attitudes have been shown to be detrimental to the handicapped. They have been victims of the education system from lack of facilities, personnel, appropriate educational channeling and understanding, instead of being provided with services appropriate to their special needs. And the cost exacted at the higher education level has been less an exchange of money than a change of attitude. (Doran-1975)

Robert Mehan has described institutions of higher learning as change agents relative to attitudes. He stated that they are now in a position to help move the

general population towards a greater understanding and acceptance of disabled citizens by setting a positive example of making their programs accessible to and actively working to positively influence the attitudes of the able-bodied people towards the disabled. (1977)

There have been two philosophies espoused on handling the handicapped on campus. One also appropriate to colleges with dormitory facilities included providing enough specialized support services to permit even the most severly handicapped student independent housing and mobility on campus. The alternate approach included providing the severely handicapped with special care and facilities. (EFL-1977)

College administrators have been charged with planning educational programs for the students enrolled in their colleges. In planning activities to promote accessibility it has been suggested that one first analyze one's own attitudes toward handicapped students, recognize that handicapped students are not as limited as they may first appear, and request help from the handicapped in planning and adapting facilities. (McDevitt-1975) The community college's new students have been identified as being from the handicapped population and they must be served. (Thornton-1977)

Historically, physically handicapped people have been subjected to unnecessary impediments in the built environment. Such impediments have interfered with those who most require education. (State-1974) This concern has relevance to occupational barriers for the handicapped for if they have found educational institutions inaccessible they will also find resultant occupational barriers. Attitudinal barriers have also been found here, and the Wall Street Journal in January 1976 stated that the major barriers to employment of eight million disabled are attitudinal. Yuker-1977) In addition, statistics have shown that only forty percent of disabled adults are gainfully employed compared with seventy-five percent of non-disabled.

Along with negative attitudes of employers have gone myths and stereotypes. Some of these were that insurance rates will rise for handicapped employees, that work places would have to be adjusted at considerable expense, that they will have to treat the handicapped differently and that present employees may not accept them. Good management has merely matched the individuals' abilities to the job requirements. (Sears-1975)

And as Tom Schworles has stated, education is the only avenue for vocational independence for the severely disabled. (1975) Tindall has outlined four stages in t.e

process of providing vocational education for the handicapped. They were:

1. "Be aware of the characteristics, needs and capabilities of the handicapped.
2. Accept the philosophy that the handicapped can and should be educated and be committed to take immediate action.
3. Modify educational programs and supportive services to help the handicapped achieve to the best of their abilities.
4. Employ handicapped through changes in attitudes, identify work that handicapped persons can perform and adapt jobs accordingly." (1975)

These stages were directly related both to educational and occupational barriers and eventual employment of the handicapped, for vocational education has played a large part in the handicapped person's success. Peter Porteus candidly has remarked that the handicapped are capable of their best and that takes in every occupational area and job description in the labor market. (1978) It has been further stated that there is no such thing as "Handicapped" people, only people with varied abilities, for the handicapped have been successfully placed, retained and have had a positive impact on their peers, managers and organizational climate. (Pati-1978)

Therefore, Stiglitz has maintained that the severely disabled and handicapped should be provided maximum opportunity to develop all intellectual potentials and

other job related skills and abilities. (1973) And this has been expanded by a challenge for the future to work collectively to overcome the existing attitudinal, program and physical barriers that exist for the handicapped and plan how best to facilitate their participation in the labor market and society. (Halloran-1978)

In order not to discriminate against the handicapped an institution must not only have opened its doors, but it must have made sure that everybody can get through them. With this in mind, there have been required actions in several areas as follows:

1. Mobility barriers must be removed.
2. Discriminatory admission tests must be altered.
3. Equal counseling must be provided.
4. Auxiliary aids must be provided.
5. Course requirements must be altered. (The Handicapped-1976)

The preceding items were all identified as activities to comply with Section 504 but all have financial implications for post-secondary institutions.

With shrinking budgets institutions have been faced with complying with the legislation which will have an economic impact on each college. The government has estimated that the cost for compliance for all recipients of Federal funds will be between $299-$544 million dollars

annualized between $30-$55 million dollars. (O'Neill-1977)

Another problem for the institutions has been identified as the increasing numbers of students requiring support services. As increasing numbers of adults return to school there will be more students with limited capacities resulting from advancing age. (The Handicapped-1976)

In addition, the development of supportive services and faculty sensitivity has been described as influencing accessibility. The support services arm has been urged to move with a great deal of sensitivity and understanding and help the administration and instructors understand the nature and problems of the handicapped. (Kelley-1977)

Compliance with this legislation has not only necessitated additional funds but it has also pointed out the need for an efficient means of administration of services to the handicapped and the college. It has been said that ultimately society will benefit from educating the handicapped because these persons will tend to have better employment and social opportunity. The result from this was projected to be greater independance, better jobs and a larger contribution by the handicapped to their communities.

As the writer reviewed the literature she wondered what would happen when an institution was not in compliance. Was the Office of Civil Rights ready to enforce this legislation? Gallaudet Today reported that citizens with

disabilities are becoming increasingly assertive in requesting a better level of committment and responsiveness from federal, state, and local governments. Affirmative action and equal employment opportunities for the general population have been capitalized upon by handicapped consumers to meet some of their own needs. (Pimentel-1977) Disabled students have been encouraged in Massachusetts to join together and deal with problems in higher education to assure their rights. (Golloy-1976)

And in Greenville, South Carolina a college was told to reconsider a handicapped applicant and to base their decision on the person's academic and technical qualifications and not the hearing disability. (Fields-1978) The Office of Civil Rights has also been implicated in this legislation as they have recently installed twelve teletypewriters (TTY's) after a deaf person filed a complaint against the agency on discrimination. (Washington Associated Press-1978) These examples and others have indicated to the author that the government does intend to uphold this legislation for the benefit of the handicapped citizens of our country.

In conclusion, the writer looked at the literature in relation to achievements of some selected post-secondary institutions and their services to the handicapped. At

Miami-Dade Community College, North Campus, they focused attention on attitudinal barriers in response to finding that disabled people often discuss the fact that the disability is not so much a functional limitation as is the negative attitude of others. Experimental workshops were developed with the team approach and they examined their feelings about people with physical disabilities. (Fix-1977)

The initiator of a program for the handicapped in biomedical instrumentation found the real problem is that we are all members of some kind of a minority, and that looking at a person in a wheelchair makes one aware of one's own frailty. They looked at people in terms of what they are capable of and the program's success was due primarily to the ability and determination of the handicapped. (Rosenbrier-1974)

In 1947 the University of Illinois started an exemplary program for the physically disabled which has continued to expand in its scope and services. (Gardner-1974)

The City Colleges of Chicago have recently established a center for Program Development and the Handicapped. The presidents of the seven colleges, the Central Administration and the Center has been committed to removing social and

physical barriers which keep a disabled person from receiving education and training. (Center-1977) Also in Illinois, Black Hawk College has been proud to claim that their door not only opens, but opens wide and easily enough to welcome the handicapped. (Fuller-1975) The Illinois Office of Education has established an Illinois Network of Exemplary Programs to improve the quality of vocational education for all persons especially the handicapped and disadvantaged. (Batsche-1977) This network has been valuable for Harper College, as well as other community colleges in the state.

This chapter has reviewed the literature available on handicapped persons in general and has identified specific barriers to accessibility. The problems of compliance and resultant legal action has been discussed as well as examples of institutions with successful programs. These references have been invaluable in assisting the writer to better understand the handicapped and their problems.

Chapter 3

PROCEDURES AND METHODOLOGY

The development of the plan for institutional compliance with Section 504 and the methodology employed involved many members of the staff of Harper College. Data were researched regarding available services for handicapped persons as well as general programmatic accessibility in all areas of the college. The plan had five major components in its development. These were the initial assurance and notification, the transition plan, the self-evaluation, the summary implementation and the community evaluation.

This MARP involved the dissemination of information and the compliance efforts to the Harper campus community which included administrators, faculty, staff and students, some who were handicapped persons. The following paragraphs describe the activities that were followed in the development and implementation of the plan for institutional compliance with Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112).

Assurance and Notification

Each post-secondary educational institution receiving financial assistance from the Federal government was required by legislation to file an initial notification of program accessibility and assurance of compliance. This

notification was filed by the college compliance officer with the Office of Civil Rights, Washington, D.C. according to the prescribed timetable. It stated that William Rainey Harper College was accessible to the handicapped and identified the Vice President of Administrative Services as the compliance officer for the college. The Harper College Board of Trustees also placed the compliance assurance on their agenda and approved the following revision of the college non-discrimination policy statement at one of its monthly meetings:

> "Harper College is an equal opportunity affirmative action employer. No person shall be subject to discrimination of any kind by the college on the basis of race, religion, sex, age, national origin, handicap unrelated to ability, or unfavorable discharge from military service."

Notice of these actions were distributed to all employees by memo and the notice was posted on campus bulletin boards. Dissemination to the campus community was also accomplished by including the notice in the student newspaper The Harbinger, and in the Harper publication Harper Today.

Transition Plan

The second element of the compliance plan was the development of the transition plan to make the physical facilities of the college accessible for the handicapped. This was carried out according to the legislative guidlines and input was requested from handicapped persons attending

classes at Harper College as well as members of the Harper staff.

The identification of problem areas was solicited by the Director of the Physical Plant and his staff. In addition, input was requested by the writer from college staff members from the academic affairs and student affairs areas and from members of the student body. The identification process culminated with a Handicapped Awareness Day. On this occasion fifteen members of the Harper staff, including administrators, faculty, classified staff, students and a reporter from the local newspaper, spent their working day in wheelchairs to determine physical obstacles and to become more aware of and sensitive to the needs of the handicapped. A de-briefing session was held the day after the experience and obstacles that limited accessibility were identified for inclusion in the Transition Plan.

All identified problem areas were tabulated and listed according to Section 504 guidelines. The most serious barriers to accessibility were included in the 1977-78 Transition Plan and the remaining obstacles were listed for action in the 1978-79, 1979-80 plans. (Appendix A)

The Transition Plan for the three year period ranked by

yearly schedules from 1977-1980 was presented to the Board of Trustees for approval. Expenditures not to exceed $25,000 for the 1977-78 Plan were approved as well as the proposed schedule for 1978-1980. Physical obstacles have begun to be eliminated and accessibility achieved according to the first stage of the Plan. This will be further described in the Findings chapter.

Self-Evaluation

The development of the institutional self-evaluation portion of the compliance plan was accomplished by collecting data from all areas of the institution. The status of present services for the handicapped was described as well as program accessibility. These, as well as the following areas, were done in accord with the Rehabilitation Act of 1973 (Public Law 93-112) and the Guide to the Section 504 Self Evaluation for Colleges and Universities which was approved for use by the Office for Civil Rights of the Department of Health, Education and Welfare. Data were compiled on student programs, activities, and services and admissions and recruitment procedures. In addition, the treatment of students in social and recreational programs, transportation, health, insurance, and financial and employment assistance were researched. Finally, non-academic services such as physical education and athletics, counseling

and placement services and social organizations were explored to determine the present status and service to and for the handicapped student.

The persons providing input for the self-evaluation portion of the program were chosen in relation to their areas of responsibility and federal guidelines. A memo was forwarded to them requesting their cooperation. (Appendix B) Each person was also sent the self-evaluation questions composed by the Office of Civil Rights which were pertinent to each area. These administrators were as follows:

Dean of Student Development
Director of Student Activities
Dean of Student Services
Director of Business Services
Associate Dean of Business Division
Associate Dean of Social Science and Public Service Division
Associate Dean of Life and Health Sciences Division
Associate Dean of Liberal Arts Division
Associate Dean of Engineering, Mathematics and Physical Science Division
Associate Dean of Special Services Division
Associate Dean of Fine Arts and Design Division
Associate Dean of Life Long Learning Division
Vice President of Academic Affairs
Coordinator of Testing
Chief of Public Safety
Coordinator of Financial Aids
Director of Placement
Director of Athletics
Director of Environmental Health
Dean of Learning Resource Center
Director of College Relations
Bookstore Manager
Director of Community Services

Dean of Career Programs and Development
Dean of Continuing Education
Director of Food Service
Resigtrar and Director of Admissions
Director of Personnel

These persons all completed the self-evaluation of their respective areas. Input was sought from staff members as necessary. The author was available for consultation and met with the associate deans to further explain the project relative to the instructional divisions.

The responses to the self evaluation were organized according to the guidelines and were compiled with the legislation. (Appendix C) They were evaluated according to the Office of Civil Rights guidelines for areas of non-compliance.

Summary Implementation

In the fourth phase, a summary implementation report form was filled out each time an item of non-compliance was identified. The report forms were numbered according to the item which needed alteration of facilities or programs to achieve compliance. The writer, in consultation with each administrator, set activities and dates for compliance and forwarded the summary report forms to the persons for action. The staff members were requested to return the form with either interim comments on progress or the final action completed. These reports were then

placed with the self evaluation for future monitoring and compliance. (Appendix D) The implementation of these suggestions will be accomplished during the 1978-79 academic year in accord with Section 504 guidelines, and are further described in the Findings chapter.

Community Evaluation

In addition to the internal evaluation of the college's compliance with Section 504 the final component of the plan, the community review panel was selected to also evaluate the institution's plan. These persons were either from agencies representing the handicapped or were handicapped persons residing in the Harper community college district. Every effort was made to include persons who would be knowledgeable of different handicaps and who would be interested in post-secondary educational opportunities for the handicapped. These persons were initially contacted by telephone or teletypewriter (TTY) to determine their interest in serving on such a panel. All persons contacted agreed to review the institutional plan and they were sent an explanatory letter and a survey for completion. (Appendices E and F) The results were tabulated and are found in the Findings chapter. Persons who served on the Community Review Panel, as either representatives of their respective agencies or as handicapped persons, were as follows:

J. B. Davis, Executive Secretary
Illinois Association of the Deaf

Mrs. Janet Warble, President
Council on Understanding Learning Disabilities

Mr. Norman Koshkarian, Director
Illinois Division of Vocational Rehabilitation

Mr. Doug Donoho, Project Director, Diffusion Center
Township High School District 214

Mr. Douglas Verdonck, Director of Special Education
Palatine Township High School District 211

Dr. Pamela Gillet, Director
Northwest Suburban Special Education Organization

Mrs. Jarvis, Head Nurse
Physical Rehabilitation Unit
Alexian Brothers Medical Center

Mr. Jerry Medow, Director
Northwest Mental Health Center

Mr. Roger Boekenauer, Director
Alcoholism, Drug Dependence Program

Ms. Jacquelyn Hassett, Director Health Service
College of Lake County

Ms. Joan Brunner, Visually Impaired Teacher
Hoffman Estates High School

Mr. Don McLean
Advocates for the Handicapped, Barrington Chapter

Ms. Angela Wotal

Mrs. Richard Monroe

Mr. John Monroe

The institutional plan for compliance with Section 504 for William Rainey Harper College, including the Transition

Plan, Self-Evaluation, Implementation and results and comments from the community survey, was presented to the Board of Trustees for their information and approval. The Board of Trustees approved the institutional plan for compliance on November 9, 1978 and the college has continued the identified activities as prescribed in the Plan. (Appendix G)

Chapter 4

FINDINGS AND RECOMMENDATIONS

A plan for institutional compliance with Section 504 of the Rehabilitation Act of 1973 was developed and was the final document produced by the writer for William Rainey Harper College. During the development of this MARP, college staff were involved in providing input for the project as well as in implementing the plan.

The findings for each of the five areas were included in the Appendix in total as previously noted. They will be specifically discussed in this chapter when appropriate and recommendations for future action will also be made.

Findings

The first component of the plan was the prescribed Transition Plan. (Appendix A) This was compiled with input from both handicapped persons and Harper employees. The alterations were ranked according to need and assigned to one of the yearly plans from 1977-1980. The 1977-1978 plan contained changes in the following areas:

1. Signage identifying accessible campus routes.
2. Remodeling of bathroom facilities.
3. Readjustment of elevator timing.
4. Inaccessible food service facilities.

5. Stairwell illumination in F Building.
6. Inaccessible drinking fountains and telephones.
7. Threshold elevations.
8. Inadequate medical parking facilities.
9. Repair of inaccessible areas of outside environment.
10. Automobile communication by CB radios.

These changes were approved by the Board of Trustees and $25,000 was allocated to complete the alterations. These areas were made accessible by staff persons from the physical plant as well as outside contractors. The Director of the Physical Plant and the writer monitored the activities.

The second part of the Transition Plan was the 1978-79 phase of the alterations of physical facilities. Projects identified here were as follows:

1. Inaccessible laboratory stations for chemistry and biology classes.
2. Additional remodeling of bathroom facilities.
3. Inaccessible secretarial table.
4. Stairwell illumination in F Building.
5. Inaccessible legal technology reference room.
6. Inadequate medical parking facilities for the physical fitness center.
7. Rest areas and handrails to be installed as prescribed on campus.

The alterations of these areas were included in the 1978-79

budget and were identified for completion during that year. There were also monitored by the Director of the Physical Plant and the writer.

The final phase of the transition plan was the 1979-1980 plan to complete the identified alterations. They were outlined as follows:

1. Inaccessible lithograph and etching presses.
2. Stairwell illumination in F Building.
3. Inaccessible area in H Building such as computer graphics room, drill press and sufficient room for wheelchair movement in 222 and 214.
4. Inaccessible stairs requiring chairlift at Northwest entrance of H Building.
5. Additional remodeling of bathroom facilities.
6. Inadequate medical parking for F Building.
7. Replacement of one door per building with an automatic door.
8. Building U bathroom locker, and shower facilities inaccessible--to be altered if building still utilized in some manner.

The preceding alterations were also approved by the Board of Trustees and will be included in the 1979-1980 budget. The Director of the Physical Plant and the writer were identified as being responsible for the implementation of this phase of the plan as well as the total 1977-1980 Transition Plan.

The second component of the institutional compliance

plan was the self evaluation of the total college program for accessibility and the resultant Summary and Implementation Reports. (Appendices C and D)

Input was solicited from many members of the college staff as described in the methodology regarding the college's programmatic accessibility. The self evaluation was conducted by the use of questions found in the document, Guide to the Section 504 Self-Evaluation for Colleges and Universities. This publication was reviewed and approved for institutional use by the Office of Civil Rights of the Department of Health, Education and Welfare. The responses were compiled by the writer and areas of non-compliance were identified. Each area was entered on a summary report form with an implementation schedule. (Appendix D)

Fifteen areas of non-compliance were identified and they were as follows:

1. Inaccessible extension centers.
2. Inadequate student information regarding accessibility standards.
3. Employee information on Section 594 inadequate.
4. Comparisons have not been done between predictive index items collected in Fall 1976 and those persons completing career course requirements, June 1977 and June 1978.
5. Post admission inquiries have not been made regarding handicap accommodation.

6. Lack of communication to all academic administrators and department chairpersons relating to admissions requirements.

7. Inadequate knowledge of admissions and recruitment personnel regarding Section 504.

8. Incomplete information to applicants regarding institution's policies and practices regarding non-discrimination based on handicap.

9. Incomplete information has been disseminated to all academic administrators and faculty members.

10. Complete information on Section 504 is not presently available to handicapped students.

11. College has not designated an official to coordinate handicapped students requests for assistance, auxiliary aids or other assistance.

12. Food service facilities partially inaccessible.

13. Inaccessible health service bathroom.

14. Section 504 compliance committment is not included in present information sent to students by Financial Aids Office.

15. Present student activity policy and procedural manual does not include a statement of non-discrimination on the basis of handicap in reference to club membership practices.

After the self-evaluation had been compiled, and the areas of non-compliance identified, the writer contacted each person whose area had been identified as not being totally in compliance. The persons were sent the completed summary report forms which outlined the action to be taken and the schedule for completion. The administrator was asked to respond by either making interim comments on progress toward completion

or by recording the final information on the project's completion. These responses were inserted with the appropriate summary report form as a part of the institutional plan. (Appendix D) The writer has followed the progress of each item of non-compliance and will continue to monitor those in progress until their completion.

The final part of the institutional plan was the community evaluation. In this phase, fifteen persons who were either handicapped or were representatives of agencies or organizations that represent the handicapped were asked to review the Section 504 Compliance Plan for Harper College. (Appendix E)

All fifteen persons who agreed to evaluate the plan returned their completed surveys. However, only thirteen responses are found in the tabulation. One member of the panel chose to respond in letter form and that evaluation was placed under general comments. The other person completed the survey with her son, who is a handicapped student, and he did not complete another survey. They were asked to rate the transition plan, self-evaluation and implementation phases according to their knowledge of Harper College and its compliance with Section 504 of the Rehabilitation Act of 1973.

All members of the community review panel either

"strongly agreed" or "agreed" that the Transition Plan for architectural changes for 1977-1980 was inclusive of changes needed to promote access.

The panel was also requested to rate each area found in the Self-Evaluation with the compliance information that was provided. The responses ranged from very good to poor and were recorded in Table I.

Table I

Community Review Panel Evaluation of

Section 504 Self Evaluation

	Rating				
	Very Good	Good	Average	Poor	Total
Program accessibility	5	8			13
Admissions and recruitment	7	6			13
Academic adjustments	6	7			13
Treatment of students	8	5			13
Transportation	5	4	2	2	13
Health and insurance	9	4			13
Financial and employment assistance to students	8	4	1		13
Nonacademic services	6	5	2		13

The two poor responses to the transportation area reflected the inaccessibility of Harper College to the surrounding community. Comments reflected that the Regional Transit Authority should provide accessible buses and more extensive service to the college.

All other responses were either very good, good or average with only five being average. The writer thought that the panel's comments were very positive regarding

Harper's efforts toward compliance and provided excellent suggestions for future activity.

The panel was also asked to rate the summary report forms in relation to their adequacy in outlining areas of non-compliance and activities to be undertaken to achieve compliance. Eight members "strongly agreed" that the areas had been adequately outlined and five "agreed" that this had been done. It was the writer's thinking that the total plan had been favorably received and positively evaluated by the community review panel.

After the findings were completed, the Section 504 Compliance Plan was presented to the Board of Trustees of William Rainey Harper College for their approval. The Plan contained the Transition Plan, Self-Evaluation, Summary and Implementation, and Community Evaluation. (Appendix G) The Board of Trustees unanimously approved the Plan at its November 1978 meeting and congratulated all the participants for their efforts in its development. The writer expressed gratitude to the Board for their support of the project.

Recommendations

The following recommendations were made as a result of the development of the compliance plan, its future implementation and its effect on the institution:

1. William Rainey Harper College should continue to monitor the implementation of Section 504

Compliance Plan especially the Transition Plan and the identified areas of non-compliance.

2. A community needs analysis should be conducted by the college to determine the numbers of handicapped persons residing in the Harper district by specific handicap.

3. Future educational program development should reflect the identified educational needs of the handicapped members of the Harper community.

4. A concerted effort should be made by the college to coordinate services for all handicapped and disadvantaged students.

5. An on-going program of staff development should be instituted to increase awareness of and sensitivity to the characteristics and needs of handicapped persons.

6. Harper should continue to serve as a resource to other colleges seeking to develop institutional compliance plans.

7. Exploration should continue with surrounding community colleges and the Office of Civil Rights to determine if consortium educational programs for specific handicapped persons such as the hearing impaired can be authorized on a regional basis and not continue to be in non-compliance with Section 504.

During the development of this Major Applied Research Project the writer has identified what William Rainey Harper College is doing for the handicapped members of District 512. The Plan has also illustrated what the college needs to do to comply with Section 504 of the Rehabilitation Act of 1973 and to further develop the scope of its educational programs. As the college has identified itself as an

open-door community college, Harper must continue to open its doors to the handicapped members of the district.

As this study evolved the writer was also aware that it had implications for other colleges as they analyze their services for the handicapped student. The following suggestions and recommendations were made as a result of the work and experiences associated with this project.

Handicapped persons and agencies representing the handicapped should be involved as initial preparations are made for the development of a plan for institutional compliance. This development should have the support of the chief administrative officer of the college and the board of trustees as it would be difficult to proceed with architectural and programmatic self evaluation and change without executive commitment. In addition, the college should familiarize itself with the requirements contained in Section 504 of the Rehabilitation Act of 1973 in order that its compliance plan is consistant with the legislation.

Information should also be gathered on the numbers of potential handicapped students who are in the service area of the college. High schools within the college district should be surveyed as well as community organizations and agencies serving handicapped persons to determine the incidence of specific handicaps, and to gain community support

for and awareness of college programs. Other post-secondary institutions in the surrounding area should be consulted to determine the scope of their services to the handicapped and possible coordination of efforts towards the solution of common problems.

Handicapped students currently enrolled in the college should be identified to determine their educational needs. Information on numbers and incidence of handicapped persons can probably be found through the college health service by utilizing personal health history forms or another self-identification system. Cooperative efforts should be employed between the health service professional staff and the person or persons responsible for the development and implementation of the plan.

After the initial ground work has been laid there are specific activities that must be followed to comply with the law. The two chief ones were the development of a transition plan for analysis and change in architectural facilities and the self-evaluation of all college programs. The author has also some recommendations for these two areas as a result of her work on this plan.

The development of the three year transition plan for the alterations of architectural facilities must involve handicapped persons and persons familiar with their mobility

needs. It is recommended that an architect familiar with accessible structures be asked to survey the campus to determine its status of accessibility. Handicapped persons who are presently utilizing the college are also valuable resources for identifying inaccessible areas on the campus. These people should be requested to determine which parts of the campus are of concern to them and recommend their inclusion in the plan.

As college personnel are compiling the transition plan they should be cognizant of national standards for architectural accessibility. The American National Standards Institute (ANSI) has been recognized as publishing the standards to follow for achieving accessibility. Specifically in the state of Illinois the Capital Development Board has published a manual titled Accessibility Standards Illustrated which graphically depicts changes in facilities. Jay Jorgenson, in cooperation with the American Society of Landscape Architects, has a publication titled Landscape Design for the Disabled. The author recommends that college personnel familiarize themselves with these publications and others specific to their environments.

After all inaccessible areas have been identified, they should be prioritized according to year of implementation with all alterations completed by June 3, 1980. These

changes must be filed by year at each institution, and changes effected as prescribed. It is extremely important that monies be allocated for these projects and that they are included in the budget process. Persons should also be identified to monitor the progress of the changes outlined in the transition plan toward its final 1980 implementation.

The self-evaluation phase of the plan was designed to analyze the total college's programmatic accessibility. Handicapped persons should also be involved in this phase and may be selected either from the campus community or the community at large. The author recommends that these persons should be knowledgeable of the educational system and should provide input relative to how that system can better serve the educational needs of the handicapped. The Office of Civil Rights of the Department of Health, Education and Welfare has reviewed and approved the Guide to Section 504 Self-Evaluation for Colleges and Universities, and it is strongly recommended that this guide be utilized in the self-evaluation.

The Guide has been found to be inclusive of the total college program and the total college should be involved in the evaluation. One person should be designated as being responsible for requesting and compiling the data, but each area should be evaluated by those persons responsible

for the specific area. This mandates that the total college community look carefully at courses, policies and procedures and identify if they are totally accessible to the handicapped. The areas of non-compliance must be identified and actions outlined to achieve compliance. The self-evaluation, like the transition plan, should be monitered until all areas of non-compliance are remedied. Periodic reports are to be made to the Section 504 Compliance Officer, President and Board of Trustees for their information.

After these phases are completed the author strongly suggests that a community panel review the plan for further input and suggestions. This panel should be composed of handicapped persons and persons from community agencies that represent the handicapped.

The college should use the information to further coordinate efforts in serving the handicapped. Internally a person should be designated to coordinate services to the handicapped and to identify these persons who may need assistance with their education. Efforts could be made to coordinate activities with local school districts, community agencies and organizations and other post-secondary institutions.

The legislation must be closely monitored for changes necessary to continue compliance. Funding should also be

sought to provide monies for additional services needed by the handicapped and for alterations of the physical facilities.

The author also recommends that staff development activities be undertaken in relation to handicapped persons. The literature has shown that attitudes are the most pervasive barriers to the handicapped and educational institutions must assist their staff members toward attitudinal change. As colleges look at the educational needs of handicapped persons, there will be a continued need for an understanding of their abilities and the restrictions that have been placed on them by many attitudes of the able-bodied.

As post-secondary institutions further develop their educational programs to accommodate handicapped students, the able-bodied members of society will also benefit. For as obstacles are removed that have handicapped disabled persons, barriers will be eliminated that have handicapped Americans. Post-secondary educational institutions must lead the way to architectural and programmatic accessibility for all.

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APPENDIX A

Transition Plan

Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112) as amended by the Rehabilitation Act of 1974, Public Law 93-516

1977-1980

Subpart C - Program Accessibility

Discrimination Prohibited (84.21): No qualified handicapped person shall, because a recipient's facilities are inaccessible to or unusable by handicapped persons, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which these regulations apply.

Existing Facilities (84.22): A recipient shall operate each program or activity so that, when viewed in its entirety, it is readily accessible to handicapped persons. This requirement does not require a recipient to make each of its existing facilities or every part of a facility accessible to and usable by handicapped persons.

This accessibility may be achieved through means such as:

1. Redesign of equipment;
2. Reassignment of classes or other services to accessible buildings;
3. Assignment of aides to beneficiaries;
4. Home visits;
5. Delivery of health, welfare or other social services at alternate accessible sites;
6. Alteration of existing facilities and construction of new ones;
7. Any other methods that result in making programs and activities accessible to handicapped persons.

Structural changes in existing facilities are not required where other methods are effective in achieving program accessibility. Regarding methods selected, a recipient shall give priority to those that offer programs and activities to handicapped persons in the most integrated setting appropriate.

Programs shall be accessible, using methods described in items 1 through 7 above within 60 days of the effective date of the regulations--by August 2, 1977--except that where structural changes in facilities are necessary these shall be made within three years of the effective date--by June 3, 1980--but as expeditiously as possible.

Within six months of the effective date--by December 3, 1977--recipients shall develop a transition plan for changes in facilities that are necessary to achieve program accessibility. This transition plan shall set forth the steps necessary to complete such changes and shall be developed with the assistance of interested persons (including handicapped persons and organizations representing handicapped persons). The transition plan, which shall be made available for public inspection, shall, at a minimum:

1. Identify physical obstacles in facilities that limit accessibility;
2. Describe in detail methods that will be used to make facilities accessible;
3. Specify the schedule for taking the steps necessary to achieve full program accessibility, with steps that will be taken during each year of the transition period identified clearly; and
4. Identify the person(s) responsible for implementation of the plan.

The recipient shall adopt and implement procedures to ensure that interested persons, including persons with impaired vision or hearing, can obtain information on the existence and location of services, activities, and facilities that are accessible to and usable by handicapped persons.

The Transition Plan for William Rainey Harper College was compiled by soliciting input from handicapped persons, students, administrators, faculty and staff and is as follows for years 1977-1980 as outlined in Section 504.

1977-1978 Transition Plan for Completion of

Alteration of Physical Facilities

A. Accessible routes are not easily identified on the campus. The following signage will be installed to assist the handicapped, and this is identified by specific buildings.

1. A Building: Install handicap route signs for northwest walkway, south ramp, and the internal location of elevators.
2. B Building: Install handicap route sign to south entrance.
3. C Building: Install handicap route signs to P Building Elevator.
4. D Building: Install handicap route signs to illustrate best entrances.

   Re-install handicapped sign removed from D-154.

   Install guard rails and caution signs on four chair lifts.
5. F Building: Install handicap route signs for elevators.
6. H Building: Install handicapped route signs to elevator on both floors.

   Re-install braille marks needed on elevator.
7. G Building: Install handicapped route signs to elevator and accessible walks inside and outside.
8. P Building: Install handicapped route signs to elevator on both floors.

   Install outside handicapped route signs to Buildings D, F and Medical parking in Lot #1.

B. Some bathroom facilities are inaccessible to the handicapped. These bathrooms will be altered by enlarging stalls, improving doorway access or by installing additional grab bars in previously remodeled stalls. The locations of these bathrooms are as follows:

1. A Building
   a. Bathroom stalls on third floor, southeast, to be remodeled to accommodate wheelchairs.

b. Remodeled stall on second floor, southeast, to be altered to accommodate wheelchairs and grab bar to be installed.
c. Outside doors to be removed on second floor, southeast, bathrooms to accommodate wheelchairs and handicapped signage to be installed.
d. Bathroom stalls on first floor, southwest, to be remodeled to accommodate wheelchairs.
e. Remodel one bathroom in health service and install two grab bars.

2. E Building
Remodel bathroom facilities to accommodate wheelchairs.

3. F Building
Install second grab bar in remodeled bathrooms on second floor.

C. Elevator in A Building inaccessible at times for handicapped
1. Door timing will be readjusted to allow additional time for entering and exiting.
2. Harper staff will be instructed to use service elevator.

D. Food service facilities are partially inaccessible.
1. Cafeteria
a. Cuplids will be located adjacent to hot and cold cups.
b. Counters will be accessible for viewing and selecting foods.
2. Faculty dining room
a. Furniture will be moved to make telephone accessible.
b. Trays will be available for those needing them.

E. Stairwell illumination in F Building inadequate for visually handicapped. Four ceiling mounted lights will be installed in northwest stairwell to bring illumination to proper levels.

F. Drinking fountains and telephones inaccessible. Drinking fountains and telephones inaccessible--be lowered in Buildings E, T and U and at Willow Park Center.

G. Thresholds on doorways exceed one-half inch standard elevation. Thresholds to be eliminated or elevation to be decreased to comply with ANSI standards.

H. Medical parking facilities not sufficient for numbers of handicapped persons. The following medical spaces will be allocated:
1. Two medical parking spaces will be designated on the north side of Building T.
2. Medical parking will be designated at Willow Park Center.

3. Medical parking will be designated at St. Viator site.
4. Dental Hygiene parking lot will be extended and paved to provide accessible medical parking for Building D and other buildings.
5. Curb cuts and handrails will be provided for medical parking areas in Lots #1 and #8.

I. Some areas of the outside environment are inaccessible for the handicapped and the following will be accomplished:
   1. Ramps for one step will be installed on the east and west sides of Building E.
   2. The accessibility of Buildings B, U, T and V to Building A will be investigated.
   3. The existing broken handrail to the southeast corner of Building G will be repaired and the rail for remaining half of walk will be extended.
   4. The cracked and broken steps at northeast entrance of Building C will be repaired.
   5. The broken walk to northwest entrance of Building F will be repaired.
   6. The rough walkway between Buildings D & H will be repaired.

J. Communication is not possible with handicapped persons confined to their automobiles in emergency situations. Antennas will be purchased for two donated CB radios to be installed in Public Safety cars, and their availability will be communicated via the Harbinger and college radio station.

Items A through J indentified in this plan are scheduled for completion during the 1977-1978 year. The estimated cost of $25,000 for 1977-1978 alterations and additions was approved by the William Rainey Harper College Board of Trustees on March 9, 1978.

Persons responsible for implementation of the plan are:

1. Henry Kurowski, Acting Director of Physical Plant.
2. Elizabeth R. McKay, Director of Environmental Health.

1978-1979 Transition Plan for Completion of Alteration of Physical Facilities

A. Laboratory stations for chemistry and biology classes are inaccessible for wheelchairs.
   1. Free-standing bench will be available for use in D-277, 278, and 279 biology laboratories.
   2. Accessible chemistry laboratory station will be obatined for use in D-258, 259, 260 and 261.

B. Bathroom facilities inaccessible on second floor of Building D. Handicapped bathroom facilities will be installed in east and west bathrooms on second floor of Building D.

C. Secretarial laboratory inaccessible for wheelchairs. Wheelchair accessible table will be provided for secretarial laboratory.

D. Stairwell illumination in Building F inadequate for visually handicapped. Four ceiling mounted lights will be installed in southeast stairwell to bring illumination to proper levels.

E. Legal technology reference room inaccessible for wheelchair movement. Room will be altered to provide for wheelchair movement.

F. Medical parking facilities are not sufficient for physical fitness center scheduled for completion January 1979. A medical parking lot will be located accessible to Building M.

G. Some areas of the outside environment are difficult for persons with mobility handicaps. The following hand rails and rest areas will be installed to assist in their mobility:
   1. Handrail from Building A south to medical parking.
   2. Two handrails on steep incline, east of Building C.
   3. Handrails on steps to west entrance of Building P, east of Building C and on steep slope between Buildings C & D.
   4. Handrail to west entrance of Building E.
   5. Handrails on ramp between Buildings D & H.
   6. Handrail to northwest entrance and southwest corner entrance of Building H.
   7. Rest areas as prescribed by ANSI standards on inclined walk from medical parking in Lot #1 to Building F.

Items A through G identified in this plan are scheduled for completion during the 1978-1979 year. The estimated cost has been included in the budget for that fiscal year.

Persons responsible for implementation of the plan are:

1. Henry Kurowski, Acting Director of Physical Plant.
2. Elizabeth R. McKay, Director of Environmental Health.

1979-1980 Transition Plan for Completion of Alterations of Physical Facilities

A. Building C, Room 202, inaccessible. Elevation will be provided to lithograph, etching presses for wheelchair students.
B. Stairwell illumination in Building F inadequate for visually impaired persons. Four ceiling mounts will be installed in northeast and southwest stairwells to bring illumination to proper levels.
C. Building H has some areas which are inaccessible for handicapped and these will be altered as outlined:
   1. A portable ramp for Room 210, computer graphics, for step up to room will be provided.
   2. Room 222, a & b, will be altered to provide room between printer and cabinet for movement by wheelchair students.
   3. An elevated platform in Room 211, model room, for wheelchair students to work at equipment such as drill press, table saw, etc., will be provided.
   4. Room 214 to provide for wheelchair movement around cabinets and drawing tables will be altered.
   5. Chairlift for stairs at northwest entrance will be installed.
D. Building T will be remodeled as follows to provide accessibility:
   1. Handicapped toilet facilities will be installed.
   2. An elevated platform for drill press, grinder, saw, etc., will be provided in Room 101, for wheelchair students to work at equipment.
   3. Environment will be altered to provide room for mobility of wheelchair students in Room 101.
E. Medical parking facilities are inaccessible for Building F and an accessible lot will be located between Buildings F, C and P.
F. Doorways in all buildings are heavy and difficult to open. One automatic door per building will be installed at the entrances.
G. Handicapped toilet, locker and shower facilities will be installed in Building U, if the area is still utilized in that manner.

Items A through G identified in this plan are scheduled for completion during the 1979-1980 year and by June 3, 1980 in compliance with section 504. The cost for these items will be included in the 1979-1980 budget.

Persons responsible for implementation of the plan are:

1. Henry J. Kurowski, Acting Director of Physical Plant.
2. Elizabeth R. McKay, Director of Environmental Health.

William Rainey Harper College

APPENDIX B

Memo to:

From: Liz McKay

Date: April 20, 1978

Subject: SECTION 504 SELF-EVALUATION

Harper College is obligated by Federal legislation to comply with Section 504 of the Rehabilitation Act of 1973. A transition plan for architectural barriers has been approved by the Board of Trustees as one part of the compliance requirements.

The college must also complete a self-evaluation of all its programs, services, and facilities during the 1977-78 academic year. We have recently received a guide for this self-evaluation and are asking your cooperation in completing the attached form which is pertinent to your area. Please respond to each item as requested.

I will be glad to assist you with any questions you may have in this project. Please complete the self-evaluation with staff and committee input when appropriate and return the information to me no later than May 19, 1978. I look forward to working with you on this project and appreciate your assistance in complying with this important legislation.

/kh

Attachment

cc: J. Birkholz
G. Fischer

APPENDIX C

84.1 Purpose.

The purpose of this part is to effectuate section 504 of the Rehabilitation Act of 1973, which is designed to eliminate discrimination on the basis of handicap in any program or activity receiving Federal financial assistance.

84.2 Application.

This part applies to each recipient of Federal financial assistance from the Department of Health, Education, and Welfare and to each program or activity that receives or benefits from such assistance.

84.3 Definitions.

As used in this part, the term:

(a) "The Act" means the Rehabilitation Act of 1973, Pub. L. 93-112, as amended by the Rehabilitation Act Amendments of 1974, Public Law 93-516, 29 U.S.C. 794.

(b) "Section 504" means section 504 of the Act.

(c) "Education of the Handicapped Act" means that statute as amended by the Education for all Handicapped Children Act of 1975, Pub. L. 94-142, 20 U.S.C. 1401 et seq.

(d) "Department" means the Department of Health, Education and Welfare.

(e) "Director" means the Director of the Office for Civil Rights of the Department.

(f) "Recipient" means any state or its political subdivision, any instrumentality of a state or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended directly or through another recipient, including any successor, assignee, or transferee of a recipient, but excluding the ultimate beneficiary of the assistance.

(g) "Applicant for assistance" means one who submits an application, request or plan required to be approved by a Department official or by a recipient as a condition to becoming a recipient.

(h) "Federal financial assistance" means any grant, loan, contract (other than a procurement contract or a contract of insurance or guaranty), or any other arrangement by which the Department provides or otherwise makes available assistance in the form of:

(1) Funds;

(2) Services of Federal personnel; or

(3) Real and personal property or any interest in or use of such property, including:

(i) Transfers or leases of such property for less than fair market value or for reduced consideration; and

(ii) Proceeds from a subsequent transfer or lease of such property if the Federal share of its fair market value is not returned to the Federal Government.

(i) "Facility" means all or any portion of buildings, structures, equipment, roads, walks, parking lots, or other real or personal property or interest in such property.

(j) "Handicapped person." (1) "Handicapped persons" means any person who (i) has a physical or mental impairment which substantially limits one or more major life activities, (ii) has a record of such an impairment, or (iii) is regarded as having such an impairment.

(2) As used in paragraph (j)(1) of this section, the phrase:

(i) "Physical or mental impairment" means (A) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive, digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or (B) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

(ii) "Major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

(iii) "Has a record of such an impairment" means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

(iv) "Is regarded as having an impairment" means (A) has a physical or mental impairment that does not substantially limit major life activities but that is treated by a recipient as constituting such a limitation; (B) has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others toward such impairment; or (C) has none of the impairments defined in paragraph (j) (2) (i) of this section but is treated by a recipient as having such an impairment.

(k) "Qualified handicapped person" means:

(1) With respect to employment, a handicapped person who, with reasonable accommodation, can perform the essential functions of the job in question;

(2) With respect to public preschool elementary, secondary, or adult educational services, a handicapped person (i) of an age during which nonhandicapped persons are provided such services, (ii) of any age during which it is mandatory under state law to provide such services to handicapped persons, or (iii) to whom a state is required to provide a free appropriate public education under 612 of the Education of the Handicapped Act; and

(3) With respect to postsecondary and vocational education services, a handicapped person who meets the academic and technical standards requisite to admission or participation in the recipient's education program or activity;

(4) With respect to other services, a handicapped person who meets the essential eligibility requirements for the receipt of such services.

(l) "Handicap" means any condition or characteristic that renders a person a handicapped person as defined in paragraph (j) of this section.

84.4 Discrimination prohibited.

(a) *General.* No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives or benefits from Federal financial assistance.

(b) *Discriminatory actions prohibited.* (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap:

(i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service;

(ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others;

(iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others;

(iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others;

(v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program;

(vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or

(vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit or service.

(2) For purposes of this part, aids, benefits, and services, to be equally effective, are not required to produce the identical result or level of achievement for handicapped and nonhandicapped persons, but must afford handicapped persons equal opportunity to obtain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.

(3) Despite the existence of separate or different programs or activities provided in accordance with this part, a recipient may not deny a qualified handicapped person the opportunity to participate in such programs or activities that are not separate or different.

(4) A recipient may not, directly or through contractual or other arrangements, utilize criteria or methods of administration (i) that have the effect of subjecting qualified handicapped persons to discrimination

on the basis of handicap, (ii) that have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the recipient's program with respect to handicapped persons, or (iii) that perpetuate the discrimination of another recipient if both recipients are subject to common administrative control or are agencies of the same State.

(5) In determining the site or location of a facility, an applicant for assistance or a recipient may not make selections (i) that have the effect of excluding handicapped person from, denying them the benefits of, or otherwise subjecting them to discrimination under any program or activity that receives or benefits from Federal financial assistance or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the program or activity with respect to handicapped persons.

(6) As used in this section, the aid, benefit, or service provided under a program or activity receiving or benefiting from Federal financial assistance includes any aid, benefit, or service provided in or through a facility that has been constructed, expanded, altered, leased or rented, or otherwise acquired, in whole or in part, with Federal financial assistance.

(c) *Programs limited by Federal law.* The exclusion of nonhandicapped persons from the benefits of a program limited by Federal statute or executive order to handicapped persons from the benefits of a program limited by Federal statute or executive order to handicapped persons or the exclusion of a specific class of handicapped persons from a program limited by Federal statute or executive order to a different class of handicapped persons is not prohibited by this part.

84.5 Assurances required.

(a) *Assurances.* An applicant for Federal financial assistance for a program or activity to which this part applies shall submit an assurance, on a form specified by the Director, that the program will be operated in compliance with this part. An applicant may incorporate these assurances by reference in subsequent applications to the Department.

(b) *Duration of obligation.* (1) In the case of Federal financial assistance extended in the form of real

property or structures on the property, the assurance will obligate the recipient or, in the case of a subsequent transfer, the transferee, for the period during which the real property or structures are used for the purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits.

(2) In the case of Federal financial assistance extended to provide personal property, the assurance will obligate the recipient for the period during which it retains ownership or possession of the property.

(3) In all other cases the assurance will obligate the recipient for the period during which Federal financial assistance is extended.

(c) Covenants. (1) Where Federal financial assistance is provided in the form of real property or interest in the property from the Department, the instrument effecting or recording this transfer shall contain a covenant running with the land to assure nondiscrimination for the period during which the real property is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits.

(2) Where no transfer of property is involved but property is purchased or improved with Federal financial assistance, the recipient shall agree to include the covenant described in paragraph (b) (2) of this section in the instrument effecting or recording any subsequent transfer of the property.

(3) Where Federal financial assistance is provided in the form of real property or interest in the property from the Department, the covenant shall also include a condition coupled with a right to be reserved by the Department to revert title to the property in the event of a breach of the covenant. If a transferee of real property proposes to mortgage or otherwise encumber the real property as security for financing construction of new, or improvement of existing, facilities on the property for the purposes for which the property was transferred, the Director may, upon request of the transferee and if necessary to accomplish such financing and upon such conditions as he or she deems appropriate, agree to forbear the exercise of such right to revert title for so long as the lien of such mortgage or other encumbrance remains effective.

84.6 Remedial Action, voluntary action, and self-evaluation.

(a) Remedial action. (1) If the Director finds that a recipient has discriminated against persons on the basis of

handicap in violation of section 504 of this part, the recipient shall take such remedial action as the Director deems necessary to overcome the effects of the discrimination.

(2) Where a recipient is found to have discriminated against persons on the basis of handicap in violation of section 504 of this part and where another recipient exercises control over the recipient that has discriminated, the Director, where appropriate, may require either or both recipients to take remedial action.

(3) The Director may, where necessary to overcome the effects of discrimination in violation of section 504 of this part, require a recipient to take remedial action (i) with respect to handicapped persons who are no longer participants in the recipient's program but who were participants in the program when such discrimination occurred or (ii) with respect to handicapped persons who would have been participants in the program had the discrimination not occurred.

(b) *Voluntary action.* A recipient may take steps, in addition to any action that is required by this part, to overcome the effects of conditions that resulted in limited participation in the recipient's program or activity by qualified handicapped persons.

(c) *Self-evaluation.* (1) A recipient shall, within one year of the effective date of this part:

(i) Evaluate, with the assistance of interested persons, including handicapped persons or organizations representing handicapped persons, its current policies and practices and the effects thereof that do not or may not meet the requirements of this part;

(ii) Modify, after consultation with interested persons, including handicapped persons or organizations representing handicapped persons, any policies and practices that do not meet the requirements of this part; and

(iii) Take, after consultation with interested persons, including handicapped persons or organizations representing handicapped persons, appropriate remedial steps to eliminate the effects of any discrimination that resulted from adherence to these policies and practices.

(2) A recipient that employs fifteen or more persons shall, for at least three years followed completion of the evaluation required under paragraph (c) (1) of this section, maintain on file, make available for public inspection, and provide to the Director upon request: (i) a list of the interested persons consulted, (ii) a description of areas examined and any problems identified, and (iii) a description of any modifications made and of any remedial steps taken.

84.7 Designation of responsible employee and adoption of grievance procedures.

(a) *Designation of responsible employee.* A recipient that employs fifteen or more persons shall designate at least one person to coordinate its efforts to comply with this part.

(b) *Adoption of grievance procedures.* A recipient that employs fifteen or more persons shall adopt grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part. Such procedures need not be established with respect to complaints from applicants for employment or from applicants for admission to postsecondary educational institutions.

84.8 Notice

(a) A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its programs and activities. The notification shall also include an identification of the responsible employee designated pursuant to 84.7(a). A recipient shall make the initial notification required by this paragraph within 90 days of the effective date of this part. Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.

(b) If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

84.9 Administrative requirements for small recipients.

The Director may require any recipient with fewer than fifteen employees, or any class of such recipients, to comply with 84.7 and 84.8, in whole or in part, when the Director finds a violation of this part or finds that such compliance will not significantly impair the ability of the recipient or class of recipients to provide benefits or services.

84.10 Effect of state or local law or other requirements and effect of employment opportunities.

(a) The obligation to comply with this part is not obviated or alleviated by the existence of any state or local law or other requirement that, on the basis of handicap, imposes prohibitions or limits upon the eligibility of qualified handicapped persons to receive services or to practice any occupation or profession.

(b) The obligation to comply with this part is not obviated or alleviated because employment opportunities in any occupation or profession are or may be more limited for handicapped persons than for nonhandicapped persons.

EMPLOYMENT PRACTICES

84.11 Discrimination prohibited.

(a) *General.* (1) No qualified handicapped person shall, on the basis of handicap, be subjected to discrimination in employment under any program or activity to which this part applies.

(2) A recipient that receives assistance under the Education of the Handicapped Act shall take positive steps to employ and advance in employment qualified handicapped persons in programs assisted under that Act.

(3) A recipient shall make all decisions concerning employment under any program or activity to which this part applies in a manner which ensures that discrimination on the basis of handicap does not occur and may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap.

(4) A recipient may not participate in a contractual or other relationship that has the effect of subjecting qualified handicapped applicants or employees to discrimination prohibited by this subpart. The relationships referred to in this subparagraph include relationships with employment and referral agencies, with labor unions, with organizations providing or administering fringe benefits to employees of the recipient, and with organizations providing training and apprenticeship programs.

(b) *Specific activities.* The provisions of this subpart apply to:

(1) Recuritment, advertising, and the processing of applications for employment;

(2) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring;

(3) Rates of pay or any other form of compensation and changes in compensation;

(4) Job assignments, job classifications, oragnizational structures, position descriptions, lines of progression, and seniority lists;

(5) Leaves of absense, sick leave, or any other leave;

(6) Fringe benefits available by virtue of employment, whether or not administered by the recipient;

(7) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, and selectiion for leaves of absence to pursue training;

(8) Employer sponsored activities, including social or recreational programs; and

(9) Any other term, condition, or privilege of employment.

(c) A recipient's obligation to comply with this subpart is not affected by any inconsistent term of any collective bargaining agreement to which it is a party.

84.12 Reasonable accommodation.

(a) A recipient shall make reasonable accomodation to the known physical or mental limitations of an otherwise qualified handicapped applicant or employee unless the recipient can demorstrate that the accommodation would impose an undue hardship on the operation of its program.

(b) Reasonable accommodation may include: (1) making facilities used by employees readily accessible to and usable by handicapped persons, and (2) job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters, and other similar actions.

(c) In determining pursuant to paragraph (a) of this section whether an accommodation would impose an undue hardship on the operation of a recipient's program, factors to be considered include:

(1) The overall size of the recipient's program with respect to number of employees, number and type of facilities, and size of budget;

(2) The type of the recipient's operation, including the composition and structure of the recipient's workforce; and

(3) The nature and cost of the accommodation needed.

(d) A recipient may not deny any employment opportunity to a qualified handicapped employee or applicant if the basis for the denial is the need to make reasonable accommodation to the physical or mental limitations of the employee or applicant.

84.13 Employment criteria.

(a) A recipient may not make use of any employment test or other selection criteria that screens out or tends to screen out handicapped persons or any class of handicapped persons unless: (1) the test score or other selection criterion, as used by the recipient, is shown to be job-related for the position in question, and

(2) alternative job-related tests or criteria that do not screen out or tend to screen out as many handicapped persons are not shown by the Director to be available.

(b) A recipient shall select and administer tests concerning employment so as best to ensure that, when administered to an applicant or employee who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test purports to measure, rather than reflecting the applicant's or employee's impaired skills (except where those skills are the factors that the test purports to measure).

84.14 Preemployment inquiries.

(a) Except as provided in paragraphs (b) and (c) of this section, a recipient may not conduct a preemployment medical examination or may not make preemployment inquiry of an applicant as to whether the applicant is a handicapped person or as to the nature or severity of a handicap. A recipient may, however, make preemployment inquiry into an applicant's ability to perform job-related functions.

(b) When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 84.6 (a), when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 84.6 (b), or when a recipient is taking affirmative action pursuant to section 503 of the Act, the recipient may invite applicants for employment to indicate whether and to what extent they are handicapped, *provided*, That:

(1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary or affirmative action efforts; and

(2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential as provided in paragraph (d) of this section, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with this part.

(c) Nothing in this section shall prohibit a recipient from conditioning an offer of employment on the

results of a medical examination conducted prior to the employee's entrance on duty, *Provided*, That: (1) All entering employees are subjected to such an examination regardless of handicap, and (2) the results of such an examination are used only in accordance with the requirements of this part.

(d) Information obtained in accordance with this section as to the medical condition or history of the applicant shall be collected and maintained on separate forms that shall be accorded confidentiality as medical records, except that:

(1) Supervisors and managers may be informed regarding restrictions on the work or duties of handicapped persons and regarding necessary accommodations;

(2) First aid and safety personnel may be informed, where appropriate, if the condition might require emergency treatment; and

(3) Government officials investigating compliance with the Act shall be provided relevant information upon request.

HEW Regulations (Subpart B)

Subpart B--Employment Practices

84.11 Discrimination Prohibited

1. Is the institution covered by Section 503 of the Rehabilitation Act of 1973, as amended? (Does it have one or more federal contract or subcontract of $2,500 or more?)

Yes_____ No__X__

PROGRAM ACCESSIBILITY

84.21 Discrimination prohibited.

No qualified handicapped person shall, because a recipient's facilities are inaccessible to or unusable by handicapped persons, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which this part applies.

84.22 Existing facilities.

(a) *Program accessibility.* A recipient shall operate each program or activity to which this part applies so that the program or activity, when viewed in its entirety, is readily accessible to handicapped persons. This paragraph does not require a recipient to make each of its existing facilities or every part of a facility accessible to and usable by handicapped persons.

(b) *Methods.* A recipient may comply with the requirement of paragraph (a) of this section through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of health, welfare, or other social services at alternate accessible sites, alteration of existing facilities and construction of new facilities in conformance with the requirements of 84.23, or any other methods that result in making its program or activity accessible to handicapped persons. A recipient is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with paragraph (a) of this section. In choosing among available methods for meeting the requirement of paragraph (a) of this section, a recipient shall give priority to those methods that offer programs and activities to handicapped persons in the most integrated setting appropriate.

(c) *Small health, welfare, or other social service providers.* If a recipient with fewer than fifteen employees that provides health, welfare, or other social services finds, after consultation with a handicapped person seeking its services, that there is no method of complying with paragraph (a) of this section other than making a significant alteration in its existing facilities, the recipient may, as an alternative, refer the handicapped person to other providers of those services that are accessible.

(d) *Time period.* A recipient shall comply with the requirement of paragraph (a) of this section within sixty days of the effective date of this part except that where structural changes in facilities are necessary, such changes shall be made within three years of the effective date of this part, but in any event as expeditiously as possible.

(3) *Transition plan.* In the event that structural changes to facilities are necessary to meet the requirement of paragraph (a) of this section, a recipient shall develop, within six months of the effective date of this part, a transition plan setting forth the steps necessary to complete such changes. The plan shall be developed with the assistance of interested persons, including handicapped persons or organizations representing handicapped persons or organizations representing handicapped persons. A copy of the transition plan shall be made available for public inspection. The plan shall, at a minimum:

(1) Identify physical obstacles in the recipient's facilities that limit the accessibility of its program or activity to handicapped persons;

(2) Describe in detail the methods that will be used to make the facilities accessible;

(3) Specify the schedule for taking the steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and

(4) Indicate the person responsible for implementation of the plan.

(f) *Notice.* The recipient shall adopt and implement procedures to ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of services, activities, and facilities that are accessible to and usable by handicapped persons.

84.23 New construction.

(a) *Design and construction.* Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by handicapped persons, if the construction was commenced after the effective date of this part.

(b) *Alteration.* Each facility or part of a facility which is altered by, on behalf of, or for the use of a recipient after the effective date of this part in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by handicapped persons.

(c) *American National Standards Institute accessibility standards.* Design, construction, or alteration of facilities in conformance with the "American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Handicapped," published by the American National Standards Institute, Inc. (ANSI A117.1-1961 (R1971)),[1] which is incorporated by reference in this part, shall constitute compliance with paragraphs (a) and (b) of this section. Departures from particular requirements of those standards by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.

Subpart C--Program Accessibility

The Self-Evaluation

2. Who is the institutional officer responsible for the Transition Plan and its implementation?

Name:	Henry J. Kurowski
Title:	Acting Director, Physical Plant
Address:	William Rainey Harper College
Telephone Number:	(312) 397-3000 Ext. 350

Name:	Elizabeth R. McKay
Title:	Director of Environmental Health
Address:	William Rainey Harper College, Room 362
Telephone Number:	(312) 397-3000 Ext 340

Describe the steps that will be taken to ensure a full integration and complete consistency between the Transition Plan and the Self-Evaluation.

1. The Transition Plan was prepared cooperatively by the Acting Director of Physical Plant and Director of Environmental Health and approved for implementation by the Board of Trustees.

2. The Director of Environmental Health has signed off on all projects relating to Phase I (1977-78) of the 1977-1980 Transition Plan and has served as a resource person to Director of Physical Plant and his staff in the project.

3. The Director of Environmental Health solicited input from members of the campus community regarding Self-Evaluation data.

4. The Self-Evaluation for Harper College will be compiled by Director of Environmental Health and there will be complete consistency with the Transition Plan in this effort.

5. The implementation of the Transition Plan will take place concurrently with the compilation of the Self-Evaluation and after its completion. Implementation will follow the completion of the institutional Self-Evaluation

3. List those facilities that the institution rents or leases (or uses through any other arrangement) for programs, activities or services offered by the college or university?

Facilities	Accessibility Status
1. Barrington High School 616 West Main Street Barrington, Illinois	
2. Clearmont School 280 Clearmont Drive Elk Grove, Illinois	
3. Elk Grove Village Public Library 101 Kennedy Boulevard Elk Grove, Illinois	
4. Grove Junior High School 777 Elk Grove Boulevard Elk Grove, Illinois	
5. Hersey High School 1900 East Thomas Street Arlington Heights, Illinois	
6. Hoffman Bowling Lanes Higgins and Roselle Roads Hoffman Estates, Illinois	
7. Kirk Center 520 South Plum Grove Road Palatine, Illinois	Completely accessible
8. Northwest Opportunity Center 15 E. Palatine Road Arlington Heights, Illinois	
9. Palatine Library 500 North Benton Street Palatine, Illinois	

Facilities	Accessibility Status
10. St. Viator High School 1213 East Oakton Arlington Heights, Illinois	
11. Schaumburg Township Public Library 32 West Library Lane Schaumburg, Illinois	
12. Willow Park Center Palatine Road and Milwaukee Avenue Wheeling, Illinois	Completely accessible
13. Wheeling High School 900 South Elmhurst Road Wheeling, Illinois	

For each of those facilities listed, describe steps that will be taken to ensure that such facilities are accessible, or that the use of such facilities will not result in the inaccessibility of any programs or activities of the institution.

Accessibility Plan for Extension Locations

1. A survey will be taken by September 1, 1978 of all extension locations by the Director of Community Services to determine accessibility.

2. All future programs and activities of the college will be held in locations which are accessible.

3. Future programs and activities formerly held in extension locations which are not found to be accessible according to the survey will be made available at another location.

4. Any locations not in compliance will be noted in the college publications of the programs and activities and an alternative location will be identified.

5. All locations which are selected on a contracted basis in which the arrangement has been made to bring our programs and services to a group of students primarily sponsored by the host organization will not be considered as appropriate to list within this statement. Each sponsoring organization will be seen as responsible for their own facility compliance and not as the responsibility of Harper College.

4. List any buildings or facilities that have been constructed since September 2, 1969 with federal construction funds. In each case, indicate whether or not such buildings or facilities have been constructed in accordance with ANSI standards.

There have not been any buildings constructed at William Rainey Harper College since September 2, 1969 with federal construction funds.

5. Discuss any steps that may be taken to inform students and employees of general accessibility standards, so that they may report problem areas to the responsible campus official. Discuss also steps that will be taken to adopt and implement procedures for informing interested persons, including those with sight and hearing impairments, of the existence and location of accessible services, activities, and facilities.

Students will be informed of general accessibility standards and the following will be implemented to inform interested persons:

A. Publication of the standards will be found in the following locations:
   1. Annually in the Student Handbook.
   2. Biannually in the Harbinger, the college newspaper.
B. The name and office number of the responsible campus official would also be listed in the Handbook and Harbinger.
C. Directory including the existence and location of accessible services, activities and facilities would be printed in above publications.
D. Individual directory handouts will be available in the campus official's office and in the Admissions Office.

Employees will be informed of the specified information in the following manner:

A. Memoranda will be sent to all employees informing them of institution's compliance with Section 504 definition of handicapped persons as defined in the legislation.
B. The Staff Policy and Procedures Manual will contain the following:
   1. A statement on institutional compliance and a definition of handicapped.
   2. Established accessibility standards including a current campus plan of physical accessibility.

3. Name of the campus officer responsible for institutional compliance.

C. The Classified Employee Council will be made aware of institutional compliance including areas of non-compliance and remediation.

6. All steps to be taken as a result of program accessibility requirements contained in this chapter (and specific steps enumerated in the institution's Transition Plan) should be incorporated into an organized process for ensuring adequate planning, data collection, scheduling to complete the required action, records maintenance, and monitoring activities.

Discuss the procedure to be followed and the schedule for developing individual Summary Report Forms for all steps to be taken as a result of this chapter and the institution's Transition Plan.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the self-evaluation. The Transition Plan also outlines specific action by year and will be monitored by the identified responsible individuals.

POSTSECONDARY EDUCATION

84.41 Application of this subpart.

Subpart E applies to postsecondary education programs and activities, including postsecondary vocational education programs and activities, that receive or benefit from federal financial assistance and to recipients that operate, or that receive or benefit from federal financial assistance for the operation of, such programs or activities.

84.42 Admissions and recruitment.

(a) *General.* Qualified handicapped persons may not, on the basis of handicap, be denied admission or be subjected to discrimination by a recipient to which this subpart applies.

(b) *Admissions.* In administering its admission policies, a recipient to which this subpart applies:

(1) May not apply limitations upon the number or proportion of handicapped persons who may be admitted;

(2) May not make use of any test or criterion for admission that has a disproportionate, adverse effect on handicapped persons or any class of handicapped persons unless (i) the test or criterion, as used by the recipient, has been validated as a predictor of success in the education program or activity in question and (ii) alternate tests or criteria that have a less disproportionate, adverse effect are not shown by the Director to be available;

(3) Shall assure itself that (i) admissions tests are selected and administered so as best to ensure that, when a test is administered to an applicant who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's aptitude or achievement level or whatever other factor the test purports to measure, rather than reflecting the applicant's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure); (ii) that admissions tests that are designed for persons with impaired sensory, manual, or speaking skills are offered as often and in as timely a manner as are other admissions tests; and (iii) admissions tests are administered in facilities that, on the whole, are accessible to handicapped persons; and

(4) Except as provided in paragraph (c) of this section, may not make preadmission inquiry as to whether an applicant for admission is a handicapped person but, after admission, may make inquiries on a confidential basis as to handicaps that may require accommodation.

(c) *Preadmission inquiry exception.* When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 84.6 (a) or when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 84.6 (b), the recipient may invite applicants for admission to indicate whether and to what extent they are handicapped, *Provided*, That:

(1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary action efforts; and

(2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential, that refusal to provide it will not subject the applicant to any adverse treatment, and that it will be used only in accordance with this part.

(d) *Validity studies.* For the purpose of paragraph (b)(2) of this section, a recipient may base predication equations on first year grades, but shall conduct periodic validity studies against the criterion of overall success in the education program or activity in question in order to monitor the general validity of the test scores.

84.43 Treatment of students; general.

(a) No qualified handicapped student shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any academic, research, occupational training, housing, health, insurance, counseling, financial aid, physical education, athletics, recreation, transportation, other extra-curricular, or other post-secondary education program or activity to which this subpart applies.

(b) A recipient to which this subpart applies that considers participation by students in education programs or activities not operated wholly by the recipient as part of, or equivalent to, an education program or activity operated by the recipient shall assure itself that the other education program or activity, as a whole, provides an equal opportunity for the participation of qualified handicapped persons.

(c) A recipient to which this subpart applies may not, on the basis of handicap, exclude any qualified handicapped student from any course, course of study, or other part of its education program or activity.

(d) A recipient to which this subpart applies shall operate its programs and activities in the most integrated setting appropriate.

HEW Regulations (84.42)

The Self-Evaluation

7. Does the institution have any limitation on the number or proportion of qualified handicapped persons who may be admitted?

Yes_____ No__X____

If "no" describe the general admissions process and how it relates to handicapped applicants.

General admissions process and how it relates to handicapped persons:

General Admissions: All persons seeking admission to either a transfer program, general studies program, or courses for personal enrichment may apply and be accepted at any time.

All Persons seeking admission to career programs can apply at any time unless a space limitation exists in the desired program. The following career programs have space limitations and special entrance requirements:

Dental Hygiene
Dietetic Technician
Emergency Medical Technician
Fashion Design
Interior Design
Legal Technology
Medical Laboratory Technician
Medical Office Assistant
Medical Transcriptionist
Licensed Practical Nurse
Registered Nurse
Operating Room Technician

The Dental Hygiene and Nursing Programs have application deadlines of October 1 prior to the Fall semester, the person plans to begin the program. Due to the demand of other career programs, it is to the person's advantage to return the application as soon as possible. Information concerning these special entrance requirements is forwarded to each person after the application is submitted. These requirements are sent to any person requesting admission.

Full-Time Student Admissions: A full-time student enrolls in at least 12 semester hours of credit per semester. A full-time student is required to:

1. Complete the admissions form.

2. Forward to Harper College an official transcript of all high school work and all college work attempted.

3. Forward an official copy of the American College Test (ACT) or the Scholastic Aptitude Test (SAT). This requirement is waived if the person has completed 12 semester hours of class work. Copies may be obtained by writing to:

ACT Records	SAT
P.O. Box 451	Box 592
Iowa City, IA 52241	Princeton, NJ 08540
(Harper's Code: 1163)	(Harper's Code: 1932)

4. Complete the Personal Medical History form.

5. Pay a $10.00 non-refundable application fee.

Part-Time Student Admissions: A part-time student enrolls in from 1 to 11 semester hours of credit per semester. A part-time student is required to:

1. Complete the admissions form.

2. Complete the Personal Medical History form.

3. Pay a $10.00 non-refundable application fee.

8. Based on a department-by-department analysis that includes all schools and colleges of the institution, list and briefly describe all tests and other criteria used in institutional admissions decisions. (List all tests and all criteria such as interviews, good health, high school performance, portfolio for an art student, musical ability for music students, and so forth.) For all tests listed, note the skill, level of achievement or other factor that the test purports to measure.

William Rainey Harper College practices an open admissions policy and all applicants to the institution are accepted to the college. Testing requirements for full-time students, such as the ACT and SAT are used for course placement and not to determine admission to the college.

Tests that are used by career programs in screening applicants for career programs with space limitations are as follows:

A. Watson-Glaser Critical Thinking Appraisal
B. Psychological Corporation Entrance Examination for Schools of Practical Nursing.

C. Psychological Corporation Entrance Examination for Schools of Nursing.
D. American Dental Hygiene Association Aptitude Test.

The following minimum criteria are used for all students requesting consideration for admission into each career program:

Dental Hygiene

A. Fulfillment of the General Admissions requirements of Harper College by October 1 of year prior to Fall enrollment. (High school and college transcript, ACT test, and health history).
B. Seventeen years of age or older.
C. High school graduate or G.E.D.
D. High school or college grade average of 'C'.
E. Completion of course work with a grade of 'C' in Biology, Mathematics, Chemistry at the high school or college level.
F. Satisfactory performance on the National Dental Hygiene Aptitude Test. (Test offered in November and January).
G. Satisfactory personal interview.

Dietetic Technician

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and health history).
B. Satisfactory completion of one year of high school math and science.
C. Satisfactory personal interview.

Emergency Medical Technician

A. Meet requirements of the National Registry of Emergency Medical Technicians or consent of the instructor.
B. Fulfillment of the General Admissions requirements of Harper College.
C. The requirements of the National Registry of the E.M.T. states that selection of students is based on the following priorities:

1. Emergency Ambulance and Rescue Personnel (especially fire department personnel) presently employed.
2. Individuals presenting satisfactory verification attesting that the skills learned in the E.M.T. course will be utilized in a job context.
3. Other health care personnel, i.e., L.P.N., Orderly, etc.

Licensed Practical Nurse

A. Fulfillment of the General Admissions requirements of

Harper College by October 1 of year prior to Fall enrollment. (High school and college transcript, ACT test, and health history).

B. Satisfactory results on the ACT and the Psychological Corporation Examination for Schools of Practical Nursing by October 1. Test is offered at Harper. (Call 397-3000, Ext. 541.
C. High school graduate or G.E.D.
D. Seventeen years of age or older.
E. A high school or college grade average of 'C'.
F. Completion of course work with a grade of 'C' in Biology and Mathematics at the high school or college level.
G. Satisfactory health.

Registered Nurse

A. Fulfillment of the General Admissions requirements of Harper College by October 1 of year prior to Fall enrollment. (High school and college transcript, ACT test, and health history).
B. Satisfactory results on the ACT and the Psychological Corporation Examination for Schools of Nursing by October 1. Test is offered at Harper. Call 397-3000, Ext. 541.
C. High school graduate or G.E.D.
D. Seventeen years of age or older.
E. A high school or college grade average of 'C'.
F. Completion of course work with a grade of 'C' in Biology, Mathematics, and Chemistry at the high school or college level. The Chemistry requirement must be completed within five years prior to intended entrance. If Chemistry was completed more than five years before intended entrance, then the course will be evaluated on an individual basis by the Nursing Program Coordinator.
G. Satisfactory health.

Medical Laboratory Technician

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and Health history).
B. Minimum grade of 'C' in Biology, Chemistry, and Algebra at either the high school or college level.
C. Satisfactory results on the ACT test.
D. Satisfactory personal interview.

Operating Room Technician (Certificate Program)

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and health history).

B. High school graduate or G.E.D.
C. High school or college grade average of 'C' in Biology.
D. Satisfactory results on the ACT test.
E. Satisfactory personal interview.

Medical Office Assistant

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and health history).
B. A high school or college grade average of 'C' or better.
C. The ability to type 50 wpm. (Speed timing test required)
D. Satisfactory results on the ACT test.

Medical Transcriptionist (Certificate Program)

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript ACT test, and health history).
B. A high school or college grade average of 'C' or better.
C. The ability to type 50 wpm. (Speed timing test required)
D. Satisfactory results on the ACT test.

Fashion Design

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and health history).
B. Attendance at an applicant's information seminar.

Interior Design

A. Fulfillment of the General Admissions requirements of Harper College. (High school and college transcript, ACT test, and health history).
B. Attendance at an applicant's information seminar.

Legal Technology

A. Submit a completed Application for Admission.
B. Satisfactorily pass the Watson-Glaser Critical Thinking Test. Test is offered at Harper College. Call 397-3000, Ext. 541 for an appointment.
C. Submit a written resume.

9. For each test listed above, describe steps that will be taken to ensure that it measures solely what it purports to measure and that impaired sensory, manual or speaking skills (unless those skills are the ones it purports to measure) are not being measured as well.

The tests listed in the response to the above item measure

the following skills and aptitudes:

A. ACT - Measures level of achievement in English, Mathematics, Social Science and Natural Science. Scores are related to tables of national norms for the individual's grade level.
B. Watson-Glaser Critical Thinking Appraisal - Measures five aspects of critical thinking; Inference, Recognition of assumptions, Deduction, Interpretation and Evaluation of arguments. Norms for the 9th through 12th grades are derived from 20,312 high school students at fourteen school systems in thirteen states.
C. Psychological Corporation Entrance Examination for Schools of Nursing - Measures applicant's scholastic abilities. The seven measures are used to assess the academic abilities that have been shown to be essential for achievement in nursing programs and related to future performance in these programs. The examination is nationally normed.
D. Psychological Corporation Entrance Examination for Schools of Practical Vocational Nursing - Designed to measure applicant's scholastic abilities. Used to evaluate academic abilities found to be essential for achievement in practical nursing programs and related to future performance in those programs. The examination has national norms.
E. American Dental Hygiene Association Aptitude Test - Examinations measures numerical ability, science, verbal, study-reading and requires no special test preparation. All special testing considerations are handled by the American Dental Hygiene Association.

The descriptions of these five tests were taken from information supplied by the testing agency.

10. List from the above item those tests or criteria that have a disproportionate, adverse effect on handicapped applicants, or have the potential to have such an effect on handicapped applicants.

None of the previously named tests are known to have adverse effect on handicapped applicants. Persons with handicaps who have individual testing problems are encouraged to contact the Admissions Office prior to the testing date so efforts can be made to accommodate the person's needs.

11. For each test or criterion listed above, state whether or not the Director of OCR has identified any alternate tests or criteria that would accomplish the same measurement with a less disproportionate, adverse effect on handicapped persons. Where alternate tests

or criteria have been identified by the Director of OCR, describe the steps that will be taken to employ these alternate tests or criteria in place of those currently used.

None of the five tests administered prior to admission are listed.

12. For each test or criterion listed above for which the Director of OCR has not identified any alternates, either: (A) provide background information that indicates the validity of the test or criterion as a predictor of success (Note: first-year grades may be used to monitor validity in this case); or (B) indicate steps that will be taken to modify the test or criterion or discontinue its use with respect to classes of handicapped persons affected adversely.

This item is not applicable.

13. For all tests and other criteria used in admissions, discuss the process through which the institution will conduct periodic validity studies against the criterion of overall success in the education program or activity (beyond the initial validation based on first-year grades or some equivalent factor) in order to monitor the general validity of test scores. Indicate the nature and frequency of such studies.

Records have been kept on applicants for selected career programs, since Fall Semester 1976. These compare the items included in the predictive index (Test scores, and previous scholastic records) with the successful completion of the career course requirement and the successful licensing of the graduate in specific careers. These comparisons will be done on a bi-yearly or yearly basis depending on the length of the career program.

14. Does the institution make available to applicants admissions tests that are designed for persons with impaired sensory, manual or speaking skills?

Yes_____ No__X__

If "Yes", describe what tests are available and the procedure for notifying applicants, including those with sight and hearing impairments, that such alternate tests are available.

If "No", describe steps that will be taken to make certain that such tests are made available by the institution (or will be made available as required) and that applicants, including those with sight and hearing impairments, are notified regarding the availability

of alternate tests.

These tests will be made available as requested by the handicapped applicant provided they are accessible from the testing agency. Handicapped persons will be encouraged to notify the admissions office to request these alternate services.

15. Are admissions tests administered in locations and facilities that, on the whole, are accessible to handicapped persons?

Yes X No

If "yes", describe those facilities used for testing and comment on their accessibility.

If "no", describe steps that will be taken to ensure that admissions tests are administered in locations and facilities that, as a whole are accessible to handicapped persons.

All rooms used for testing are accessible and those located on a second level have elevator access.

16. Is the institution's admissions office (or other campus facility normally used in the admissions process) accessible to all applicants?

Yes X No

17. Does the institution make any preadmission inquiries (on forms, during interviews, and so forth) regarding whether an applicant for admission is a handicapped person?

Yes No X

If "no", discuss safeguards that exist to ensure that no such preadmission inquiries are made (unless an institution is taking voluntary or remedial action, see below).

If "yes", discuss steps that will be taken to make certain that this policy or procedure is discontinued or modified to conform to section 504 requirements (unless an institution is taking voluntary or remedial action, see below)

All students are required by the college to complete only the application form prior to admission. There are no inquiries on this form which relate to the applicant's physical condition.

18. Is the institution:

taking remedial action at the request of the Director of OCR? Yes No X

taking voluntary action to overcome the effects of conditions that resulted in limited participation

in programs or activities by handicapped persons? Yes__X__ No_____

If answers to either of the above questions are "yes", then it is permissible for an institution to invite applicants for admission to indicate whether and to what extent they are handicapped. If answers to either of the above questions are "yes", will the institution be asking applicants for admission to provide voluntary information related to their possible handicaps?

Yes__X__ No_____

If "yes", describe steps that will be taken to ensure that applicants are notified that information is being requested on a voluntary basis, that it will not result in any adverse treatment, that the information will be kept confidential, and that it will be used solely in connection with remedial or voluntary action efforts. Discuss also steps that will be taken to ensure the confidentiality of such information.

Information regarding the applicant's personal health history is presently requested on the health form which is voluntarily completed by each applicant. This information is utilized solely by the Health Service for confidential screening and coding and the forms are maintained in locked files in the health service area. The information on the form is not released to anyone without the student's written permission.

19. Following admission, inquiries may be made on a voluntary and confidential basis regarding handicaps that may require accommodation or the availability of auxiliary aids, whether or not an institution is taking voluntary or remedial action. Discuss whether, and when, such inquiries will be made, how confidentiality of information will be ensured, and how specific information gathered will enter some procedure through which accommodations will be made and auxiliary aids will be available, as necessary.

At the present time, inquiries are not being made regarding handicaps that may require accommodation and the availability of auxiliary aids. In the future, the health form will be revised to contain questions of this nature. Confidentiality of all information is ensured by the Family Educational Rights and Privacy Act of 1974. Accommodations will be made and auxiliary aids will be available as the student requests them but at this time, no central location has been established for this purpose.

20. For each school or department of the institution, discuss briefly the process of selection regarding admissions. Outline the steps in the process, who is involved, and other pertinent factors. Discuss whether or not the process of selecting students from the applicant pool has any potential for discrimination against qualified handicapped persons.

The following procedures for selective admission is incorporated by the Admissions Office and the respective program coordinators, and all applicants are treated in the same manner based on prescribed qualifications:

A. Beginning October 1, candidates for the Nursing and Dental Hygiene files will be reviewed by the Admissions Office for minimum requirements. Other programs will be reviewed at a later date.
B. Students who fulfill the minimum requirements will be placed on a list in alphabetic order. Their grades and scores of tests will also be included.
C. This list will be sent to the respective Program Coordinators so the candidates can be invited in for an interview.
D. After the candidates are interviewed, the Program Selection Committee will send the scores of the interviews to the Admission Office.
E. The Admissions Office will then employ the formula, developed by the Committee for the Selection Process of Limited Enrollment Programs, and put weight on the most significant criteria of the specified program.
F. The Admissions Office will then rank the candidates by order of their scores.
G. In relation to the number of spaces allowed for the specific program, the corresponding number of candidates will be notified of their acceptance to the program.
H. Depending on the size of the program, two to five spaces will be left open for a few weeks in the event of a lost record, error, or an inequity found by the Admissions Office or Program Coordinator.
I. An alternate list by rank of score will be maintained from those students below the acceptance cut off point. If there are a large number of these candidates, a reasonable number will be kept on the alternate list and the others will be sent a letter of regret.

J. A letter of intent will be mailed with the acceptance letter and the alternate list letter. The Admissions Office will maintain a record of cancellations from the accepted candidates. As space becomes available, they will send a letter of acceptance to those on the alternate list.

K. All students not accepted or on the alternate list will be sent a letter informing them of their status.

L. All correspondence to those not accepted to a program will include an invitation to make an appointment with the Admissions Counselor to discuss the reason they were not accepted or to explore an alternate career.

M. A complete list of accepted students and the alternate list will be sent to the Program Coordinator.

21. Describe the steps that will be taken to communicate to all academic administrators and department chairpersons information and requirements related to admissions contained in all the above items.

A memo will be sent each semester to communicate current procedures to all academic administrators and department chairpersons.

22. Describe the steps that will be taken to make certain that all admissions and recruitment personnel of the institution are knowledgeable with regard to section 504 requirements, the information contained in the above items, and the prohibition against counseling students toward more restrictive courses of study or careers.

An inservice program will be conducted for admissions and recruitment personnel early in each Fall semester before visitations to high schools begin. The purpose of this program will be to describe section 504 requirements and the availability of courses of study to all students.

23. Describe the steps that will be taken to make certain that all applicants, including those with sight or hearing impairments, are notified of the institution's policies and practices regarding nondiscrimination in admissions and recruitment (and regarding specific accommodations that will be made). Include steps that will be taken to ensure that all catalogs, handbooks, forms, and communications used in admissions and recruitment accurately reflect the policies and practices of nondiscrimination based on handicap, include the institution's statement of nondiscrimination, and are available to and usable by all prospective students, including those with sight and hearing impairments.

The following steps will be taken to ensure that all applicants, including those with sight or hearing impairments, are notified of the institution's policies and practices regarding nondiscrimination in admissions and recruitment:

1. The Director of College Relations will place the following statement in catalogs, handbooks, on forms, and in communications used in admission and recruitment:

   > Harper College is in compliance with section 504 of the Rehabilitation Act of 1973 which states that: "No otherwise qualified handicapped indivisual in the United States...shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

2. Printed materials bearing the college policy on nondiscrimination will be distributed to the coordinator of the Hearing Impaired Program and brochures stating the policy will be available in the Admissions Office, Student Development (Counseling) Office, and in student lounges.
3. Prospective students with hearing impairments will receive the nondiscrimination statement in printed form accompanied by information on specific aid which will be available to the handicapped student.
4. Prospective students with sight impairments will be notified verbally by Admissions and/or Student Development personnel of the college policy and will be apprised of specific aid available to students with sight impairments.
5. College switchboard operators will be apprised of the college policy and will respond appropriately to telephone inquiries regarding the college policy.
6. Information regarding the college policy of nondiscrimination will be distributed to area health care organizations and societies.

24. Describe steps that will be taken to ensure that orientation programs do not discriminate on the basis of handicap, and that no separate orientation program replaces the regular orientation program for handicapped students.

All students, regardless of handicap, will be invited to

participate in the college's orientation program. Hearing impaired students are also given the opportunity to attend an orientation program where special services are provided to assist them. This special program has as its content all of the elements of the regular orientation program.

25. Discuss briefly the recruitment policies and practices of the institutuion, including specific steps in the recruitment processes.

There are no recruitment policies at the college and recruitment practices include disseminating information to residents of the Harper district. Some of these are as follows:

1. High School visitations
2. College nights
3. Brochures - located in community
4. Career spots in newspaper
5. Information mailed when requested by interested persons
6. Evening program for nursing information
7. Evening program for dental hygiene information
8. Informational letter to high school seniors in the district
9. Coverage to community events
10. Information program for high school counselors held on campus
11. High school students bussed to campus
12. Parent open house
13. Program coordinators and faculty visitations to local schools
14. Class schedule mailed to the 215,000 homes in the district and surrounding community
15. Radio spots
16. Catalog distribution to high schools and businesses
17. Harper speakers bureau for community events
18. Industrial contacts

26. Discuss steps that will be taken to ensure an absence of discrimination in all recruitment policies and practices, including the selection of schools and sites for visitation, the accessibility of sites used for recruitment purposes, and the education with regard to section 504 obligations of all persons who perform recruitment work in an official capacity on behalf of the institution. Discuss also what additional steps might be taken to inform others involved in the recruitment process (e.g., former students, friends of the institution

of the institution's commitment to nondiscrimination based on handicap in admissions.

Harper College recruits persons that reside in the district in a nondiscriminatory manner. All persons are invited to enroll in the college. In addition, all high schools within and surrounding the district who are primary sources of applicants are visited.

The Section 504 regulations and implications will be reviewed with all persons in the Admissions Office who participate in recruitment. Periodic news releases, statements in college publications and otherpublicity will be used to further inform the public of the institution's commitment to nondiscrimination based on handicap.

27. All steps to be taken as a result of admissions and recruitment requirements contained in this section should be the subject of individual Summary Report Forms.

Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken or actions required as a result of this section on admissions and recruitment.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

84.44 Academic Adjustments.

(a) *Academic requirements.* A recipient to which this subpart applies shall make such modifications to its academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating, on the basis of handicap, against a qualified handicapped applicant or student. Academic requirements that the recipient can demonstrate are essential to the program of instruction being pursued by such student or to any directly related licensing requirement will not be regarded as discriminatory within the meaning of this section. Modifications may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted.

(b) *Other rules.* A recipient to which this subpart applies may not impose upon handicapped students other rules, such as the prohibition of tape recorders in classrooms or of dog guides in campus buildings, that have the effect of limiting the participation of handicapped students in the recipient's education program or activity.

(c) *Course examinations.* In its course examinations or other procedures for evaluating students' academic achievement in its program, a recipient to which this subpart applies shall provide such methods for evaluating the achievement of students who have a handicap that impairs sensory, manual, or speaking skills as will best insure that the results of the evaluation represents the student's achievement in the course, rather than reflecting the student's impaired sensory, manual, or speaking skills (except where such skills are the factors that the test purports to measure).

(d) *Auxiliary aids.* (1) A recipient to which this subpart applies shall take such steps as are necessary to ensure that no handicapped student is denied the benefits of, excluded from participation in, or otherwise subjected to discrimination under the education program or activity operated by the recipient because of the absence of educational auxiliary aids for students with impaired sensory, manual, or speaking skills.

(2) Auxiliary aids may include taped texts, interpreters or other effective methods of making orally delivered materials available to students with hearing impairments, readers in libraries for students with visual impairments, classroom equipment adapted for use by students with manual impairments, and other similar services and actions. Recipients need not provide attendants, individually prescribed devices, readers for personal use or study, or other devices or services of a personal nature.

Academic adjustments (84.44)

The Self-Evaluation

28. Discuss the procedures and schedule for a department-by-department review of all academic programs and activities of the institution to determine or identify factors including the following:

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating;
(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement;
(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments;
(D) those off-campus programs (e.g., student teaching, internships) that are related as a whole, equal to those of non-handicapped students;
(E) policies or practices related to library or reading room use, special reading collections of a department, and reserved reading materials;
(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours;
(G) policies and practices related to student participation in research;
(H) inaccessible facilities that must be used by students;
(I) any special equipment or devices that may require adaptation for use by students with certain handicaps;
(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students; and
(K) all policies, procedures and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

As a part of this department-by-department analysis, all degree or course requirements that discriminate on the basis of handicap, or have the effect of discriminating on the basis of handicap, must be the subject of one of three actions: (A) it must be demonstrated that the requirement is essential to the course of study being pursued; (B) it must be demonstrated that the requirement is directly related to a licensing requirement; or (C) steps must be outlined that will result in the modification of the

requirement for individual handicapped persons.

This department-by-department analysis should identify specific areas where discrimination exists, or the potential for discrimination exists. Such areas should be highlighted for individual actions that will ensure nondiscrimination and equal opportunities for handicapped persons to participate in all education programs and activities.

William Rainey Harper College has six academic divisions which are as follows: Business, Fine Arts and Design, Engineering, Mathematics, and Physical Science, Liberal Arts, Life and Health Science, and Social Science and Public Service. The Associate Deans of these divisions surveyed coordinators, lead teachers and other faculty in response to the following items:

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating;
(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement;
(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments;
(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of nonhandicapped students;
(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours;
(G) policies and practices related to student participation in research;
(H) inaccessible facilities that must be used by students;
(I) any special equipment or devices that may require adaptation for use by students with certain handicaps;
(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students; and
(K) all policies, procedures and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

Item E was analyzed by the Dean of the Learning Resource Center and the findings will be shown at the conclusion of the departmental reviews.

Business Division

This division offers courses and programs in accounting, accounting aide, banking, finance and credit, data processing, executive secretarial development, food service management, legal secretary, marketing midmanagement, material management, medical office assistant, medical transcription, real estate, supermarket management, supervisory and administrative management.

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

There are no degree or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating in the Business Division.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

The extent to which alternate processes and procedures are necessary to eliminate discrimination in testing and evaluation of student ability and achievement would be determined on the basis of individuals and their particular handicap. These alternate testing procedures would be developed as necessary in order to comply with the best assessment of progress for the individual student.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

In the event that handicapped students would require accommodation for off-campus activities and excursions, there would be special provisions to provide the proper accommodations for students.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

It would be part of our procedural efforts to provide handicapped students with the same opportunities as nonhandicapped students in completing course and degree requirements.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

Faculty offices are accessible and any handicapped student that would require special accessibility to instructors and/or technical staff personnel would be accommodated.

(G) policies and practices related to student participation in research.

Special provisions would be provided so that handicapped students could participate in any research that is required of nonhandicapped students but in a manner that would not discriminate nor prevent them from a high level of learning and success.

(H) inaccessible facilities that must be used by students.

All facilities are accessable.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

At this time, adequate special equipment and/or devices are available to meet current needs.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

In order to accommodate those particular students whose handicaps require special teaching techniques, programs of instruction and indoctrination would be provided to regular faculty and provisions would be made for special assistance.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

It is currently the policy, procedure, and practice of the Business Division to accommodate all handicapped persons as outlined in Section 504.

Engineering, Mathematics, & Physical Sciences Division

This division offers courses and programs in chemistry, electronics, engineering, geology, mechanical engineering technology, mathematics, physics, physical science, refrigeration and air conditioning, and numerical control. Each area has reviewed its offerings, activities, and facilities as charged and reports the following findings:

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

There are no degree or course requirements that discriminate on the basis of handicap. All interested students meeting course prerequisites qualify for entry to courses of this division. All students will be advised of competencies, skills, and other requirements for course and program completion.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

Alternative testing and evaluation methods will be developed on an individual basis for identified handicapped students on request and through mutual agreement between the student and instructor.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

Field trips are required for geology and astronomy courses and are occasionally components of other courses. In all such cases, individual accommodations will be provided for students with mobility impairments, or alternative educational experiences will be substituted through mutual agreement between the student and instructor.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

There are no off-campus programs related to course or degree requirements other than field trips mentioned above.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

All faculty post office hours and have accessible offices, and are otherwise available by appointment with equal access for those with mobility impairments.

(G) policies and practices related to student participation in research.

There are no policies or procedures in matters regarding student research other than those alluded to in Part A above.

(H) inaccessible facilities that must be used by students.

Adaptations will be made to assure that equipment placement, facilities locations, and instructional supplies are available to students according to their individual needs.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

Adaptations will be made to assure that equipment placement, facilities locations, and instructional supplies are available.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

Alternative teaching approaches will be utilized when necessary to allow for completion of course requirements.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline and the content and instructional methodologies of courses, and other similar materials.

All policies, practices, and procedures of this division and documents distributed from this division have been reviewed and do not discriminate on the basis of handicap.

Fine Arts and Design Division

This division offers courses in art, architecture, music, fashion design and merchandising and interior design.

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

The following music courses will not individually prevent successful completion of an associate degree music transfer program but may prevent proficiency in a given performance instrument. They are as follows: Ear Training Skills; Music 115, 116, 215, 216. These courses would not be accessible for deaf persons. Music performance depends on the chosen instrument. As an example, woodwinds would be difficult for persons with missing digits and vocal music would not be possible for persons unable to make vocal sounds.

The courses and programs of: art studio, architecture, fashion design, interior design and fine arts require prerequisites which include two and three dimensional art and design visual identification and determination of color. They are as follows: Art 121, 122; Fashion Design 107, 109; Interior Design 101, 102; Architecture 102. These courses would be inaccessible for blind persons.

Courses that discriminate as mentioned in this section, are demonstrably essential to the course of study being pursued. Nevertheless, ways of assisting individuals possessing such handicaps, will be sought to reduce and eliminate the impact of the handicap on the ability of the individual to meet the degree/course requirements. Documentation to this effect is available for the courses mentioned above. There are no other course requirements that discriminate on the basis of handicap in this division.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

In cases other than those above, alternate testing processes which are necessary to eliminate discrimination in testing and evaluation of student ability and achievement will be developed on an individual basis through agreement with the student and instructor.

In the case of handicaps mentioned in (A), attempts will be made to devise compensations for the handicap wherever the handicap

is possessed in an appropriately moderate degree or to cooperate where the student has made efforts to meet the requirements.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

Accommodations for students with mobility impairments to participate in activities or excursions off campus will be made.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

Accommodations mentioned above will be made and will include opportunities that are, as a whole, equal to those of non-handicapped students.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

All faculty post office hours in accessible offices and are otherwise available by appointment with equal access for those with mobility impairments.

(G) policies and practices related to student participation in research.

No policies and practices other than those mentioned in (A) limit student participation in research.

(H) inaccessible facilities that must be used by students.

Adaptations will be made to assure that equipment placement, facilities locations, and instructional supplies are available to students according to their individual needs.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

Adaptations will be made to assure that equipment placement, facilities locations, and instructional supplies are available to students according to their individual needs.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

Special teaching techniques will be utilized when necessary to allow for completion of course requirements except in the case of those handicaps mentioned in (A) An attempt to devise alternative approaches for the handicaps mentioned in (A) will be made.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline and the content and instructional methodologies of courses, and other similar materials.

All policies, practices, and procedures of this division and documents distributed from this division have been reviewed and do not discriminate on the basis of a handicap other than those mentioned in (A) Efforts will be made in the case of individuals with handicaps mentioned in (A) to modify policies, procedures, and practices to permit them to meet requirements.

Liberal Arts Division

This division offers courses in english, literature, speech/theatre, foreign language, philosophy and humanities.

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

There are no degree or course requirements that discriminate on the basis of handicap in this division.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

Written and oral tests must be accompanied by suitable alternatives.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

There are no required off-campus activities or excursions.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

There are no off-campus programs as described.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

Practices are the same for all students and faculty offices are accessible.

(G) policies and practices related to student participation in research.

Policies and practices for participation in research are the same as for all students.

(H) inaccessible facilities that must be used by students.

Adequate support services are available for the handicapped.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

Adequate support services are available for the handicapped.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

All faculty have been informed to adapt teaching techniques to permit handicapped to meet requirements.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

Any steps or modifications necessary are always taken to meet individual needs.

Life and Health Science Division

The objective of the Life and Health Science Division is to implement a quality program of basic life and health science and technical courses, to provide a curriculum for students who wish to transfer to a four-year institution or enter career areas related to health care or horticulture.

Divisional Programs:

Biology: Courses in Biology are provided as transfer courses and/or support courses for various career programs.

Nursing: Courses in nursing serve to prepare students to enter the career fields of Practical Nursing and/or Registered Nursing. Completion of either sequence makes students eligible to write the appropriate licensure examination.

Dental Hygiene: Courses in Dental Hygiene prepare students to enter the career field of Dental Hygiene.

Operating Room Technician: Courses in Operating Room Technician prepare students to enter the career field of Operating Room Technician.

Medical Laboratory Technician: These courses prepare a student to enter this career field.

Dietetic Technician: These courses prepare a student to enter this career field.

Park and Grounds Operations Management: These courses prepare a student to enter the career field of management of park and grounds operations and horticulture.

Health Science Courses: Courses are offered in support of health career programs, Medical Office Assistant, Emergency Medical Technician and Child Care Programs.

The coordinators, lead teachers and faculty of the Life and Health Science Division have been consulted regarding the current requirements of Section 504 and the components of this self study. Communication with the faculty of this division will continue as appropriate related to this federal legislation.

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

There are no degree or course requirements in this division that discriminate on the basis of handicap or have the effect of so discriminating. All interested students meeting admission requirements of career programs are advised of the nature of the career program and the competencies and skills and other requirements to be mastered in order to achieve successful course and/or program completion.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

Alternative testing and evaluation methods will be developed on an individual basis for identified handicapped students upon request and through mutual agreement between the student and the course instructor.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

Field Trips: Individual accommodations will be provided for students with mobility problems, or alternative learning experiences will be developed through the mutual consent of student and course instructor.

Off and On Campus Grounds Laboratory Experiences: Certain courses within the Park Management and Horticulture programs include laboratory experiences requiring activities such as the operation of heavy equipment and tree climbing. Handicapped students would be required to demonstrate their ability to participate in these laboratory experiences safely without endangering themselves or others.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

Clinical Laboratories: Health Career Programs include clinical laboratory experiences on campus as well as in local health care agencies or institutions.

Successful completion of the clinical component of these courses is integral to success in the course and continuance in the program. Opportunities that are, as a whole, equal to those of non-handicapped students will be provided when feasible on an individual basis to students with identified handicaps. Handicapped students are expected to demonstrate the competencies and skills as required of non-handicapped students in order to fulfill course requirements.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

All faculty post office hours and are otherwise available by appointment. All divisional offices would be accessible to students with mobility impairments.

(G) policies and practices related to student participation in research.

There are no policies or practices related to student participation in research other than those described in (A).

(H) inaccessible facilities that must be used by students.

Adaptations will be made where feasible to make equipment placement and facility locations and instructional supplies available to students according to individual needs.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

Adaptations will be made where feasible to make equipment placement and facility locations and instructional supplies available to students according to individual needs.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

Alternative teaching approaches will be utilized when necessary to allow for completion of course requirements.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

Policies, procedures and practices of this division and documents distributed from this division have been reviewed and do not appear to discriminate on the basis of handicap.

Social Science and Public Service Division

This division offers courses and programs in history, criminal justice, child care, journalism, psychology, sociology, anthropology, geography, education, political science, legal technology and fire science.

(A) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating.

After careful review of all courses and degree requirements, there are no processes or requirements which discriminate on the basis of handicap in the Social Science and Public Service Division.

(B) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement.

Alternate testing is available upon request. This includes additional time, reading of test, oral tests and special arrangements with the testing service.

(C) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments.

No course activities or excursions are mandatory for course or degree completion.

(D) those off-campus programs (e.g., student teaching, internships) that are related to a course or degree requirement and must include opportunities that are, as a whole, equal to those of non-handicapped students.

Opportunities for internships are accessible and equal for all students.

(F) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours.

Facilities and office hours are accessible to all students.

(G) policies and practices related to student participation in research.

Research requirements are not mandatory for graduation or course completion.

(H) inaccessible facilities that must be used by students.

No facilities are inaccessible in this division.

(I) any special equipment or devices that may require adaptation for use by students with certain handicaps.

There is no special equipment used in these courses.

(J) any special teaching techniques that may require adaptation due to emphasis on visual or oral presentation, or involve mobility on the part of students.

There are no special physical requirements to complete courses or degree requirements in this division.

(K) all policies, procedures, and practices of the department, as reflected in written documents related to degree requirements, course requirements, the process of assigning students to courses, course descriptions, curriculum guides that outline the content and instructional methodologies of courses, and other similar materials.

Conventional teaching methods are used. Hearing impaired students are assisted as well as are blind students. Lectures can be taped in all courese offered in this division.

(E) policies or practices related to library or reading room use, special reading collections of a department, and reserved reading materials.

The Learning Resource Center, which includes the library, is accessible to all persons. Materials are accessible, but reserve materials are controlled for all persons and must be checked out through a clerk. Aisles between book shelves are wide enough for persons utilizing wheelchairs and assistance is available for obtaining books from upper shelves. Standard practices have always included lending assistance to anyone who needs help for any reason.

(29) In addition to the department-by-department analysis in the above, which may be conducted by department chairpersons alone, describe steps that will be taken to make certain that all academic administrators and faculty members are informed periodically of requirements contained in Section 504, including the following:

(A) that no student may be excluded from any course or any course of study solely on the basis of handicap;
(B) that modifications in degree or course requirements may be necessary to meet the requirements of some handicapped students (include examples);
(C) that prohibitive rules, such as those banning tape recorders from the classroom, must be waived for some handicapped students;
(D) that auxiliary aids must be permitted in the classroom when they are required to ensure the full participation of handicapped students;
(E) that alternate testing and evaluation methods for measuring student achievement will be necessary for students with impaired sensory, manual, or speaking skills (except where those are the skills being measured);
(F) that classes may have to be rescheduled to permit access for students with mobility impairments;
(G) that special equipment or devices used in the classroom (and in some cases teaching techniques that rely upon the sight, hearing, or mobility of students) may require adaptation in individual cases; and
(H) that it is discriminatory to counsel handicapped students toward more restrictive careers than nonhandicapped students, unless such counsel is based on strict licensing or certification requirements in a profession.

All faculty and administrators will be informed periodically of requirements of section 504 and the information contained in Items A to G through the faculty procedural manual. This document is updated each year, and is issued and signed for at the time of contract distribution. In addition for part-time faculty, these requirements will be included in the part-time faculty handbook.

An in-service program for all counselors will be held at least once each year to make them aware of the fact that careers are available to all persons regardless of handicap and that it is discriminatory to counsel handicapped students toward more restrictive careers than nonhandicapped students unless it is based on strict professional licensing or certification requirements.

(30) Describe the steps that will be taken to make certain that students (including those with sight or hearing impairments) are informed periodically of requirements contained in Section 504 and of modifications or adjustments that will be made for individual handicapped students, including:

(A) that no one may be excluded from any course, or course of study, on account of handicap;
(B) that classes will be rescheduled for students with mobility impairments if they are scheduled for inaccessible classrooms;
(C) that academic degree or course requirements may be modified in certain instances to ensure full participation by handicapped students;
(D) that alternate methods of testing and evaluation are available in all courses offered by the institution for students with requirements for such methods;
(E) that auxiliary aids are made available by the institution for students with impaired sensory, manual, or speaking skills; and
(F) that certain campus rules and regulations may be waived if they limit the participation of handicapped students.

Identified handicapped students will be informed every semester by the designated college official of Section 504 requirements and modifications and adjustments that will be made for individual students including that information contained in Items A-F. This information will also be available in the Admissions Office, Division of Special Services and the Health Service.

(31) Describe the general process that will be employed for rescheduling classes to make certain that all courses are available on request to students with mobility impairments.

As in current and past practice classes will be rescheduled when requested if the original location is not accessible for students with mobility impairments.

(32) Describe steps that will be taken to ensure that no automatic or arbitrary scheduling or rescheduling process makes changes or special arrangements for any handicapped student who may not desire or require such treatment.

Special scheduling or rescheduling for handicapped students will be by request of the student on an optional basis and will not be done automatically.

(33) Does the institution have any specific prohibitions against tape recorders in classrooms, dog guides in campus buildings, or

other similar aids that may be required for full participation by handicapped persons?

Yes_____ No__X__

(34) Supplementing information gathered and actions required as a result of the department-by-department analysis in (27), describe any modifications in library policies, practices, services, or facilities that will be required to ensure equal opportunity for handicapped persons. Consider all user services and how they will be delivered (or made accessible) to handicapped persons, especially persons with visual impairments (and their readers).

The Learning Resource Center has ground level access for entering and an elevator for vertical access to all areas. There are several rooms and alcove areas available for the visually impaired and their readers. The Learning Resource Center also participates in the Illinois Library Network and the North Suburban Library System which allows additional access to special materials and also allows handicapped persons special access. Staff assistance practices will continue to be reinforced with new employees and student aides to provide services to all consumers.

Harper College operates a bookstore for students to purchase books and materials for course assignments. The store has an accessible entrance and exit and is basically a self-service operation. Staff members assist customers whenever needed and all persons can be accommodated by the store.

(35) Describe the process of registering for courses and modifications in this process that may be necessary to ensure full participation for handicapped persons. Include information related to registration facilities, forms, and scheduling, and the provision of auxiliary aids during registration?

Registration is conducted in the administration building which is completely accessible and by telephone which is also available to anyone registering part-time who has completed an application. Staff members including administrators, faculty, counselors and student aides are available to provide assistance during registration and interpreters are also available if hearing impaired persons desire to register in open registration.

(36) Describe the steps that will be taken to ensure that alternate testing and evaluation methods for measuring student achievement are available in every department of the institution, as required, for students with impaired sensory, manual, and speaking skills. How will the tests by administered? Discuss the

procedure that will be followed for making tests available to individual students and for training faculty members in their use, as necessary.

Business Division: In order to assure that adequate testing and evaluation is made available for handicapped students special procedures would be implemented including the use of sign language for the hearing impaired, use of oral testing for the sight impaired, and for those students who have other handicaps tests of skill would be administered by personnel who have been specially trained in this procedure. These specially trained personnel would, of course, be provided by the institution and/or special testing to be provided to the regular staff members of the division.

It is the intent of the Business Division to provide a wide range of educational resources, testing procedures, and career building accommodations to provide a rich and meaningful learning environment for all handicapped students as outlined in Section 504 of the Rehabilitation Act. In the event that procedures and/or facilities are not now available, they would be provided on the basis of individual need for handicapped students.

Engineering, Mathematics & Physical Sciences: Alternative testing and evaluation methods will be developed on an individual basis for identified handicapped students on request and through mutual agreement between the student and instructor.

Fine Arts and Design Division: In cases other than those stated previously, in the divisional review alternate testing processes which are necessary to eliminate discrimination in testing and evaluation of student ability and achievement will be developed on an individual basis through agreement with the student and individual basis through agreement with the student and instructor.

In the case of handicaps mentioned above, attempts will be made to devise compensations for the handicap wherever the handicap is possessed in an appropriately moderate degree or to cooperate where the student has made efforts to meet the requirements.

Liberal Arts Division: Written and oral tests must be accompanied by suitable alternatives.

Life and Health Science Division: Alternative testing and evaluation methods will be developed on an individual basis for identified handicapped students upon request and through mutual agreement between the student and the course instructor.

Social Science & Public Service Division: Having reviewed all courses in History, Criminal Justice, Child Care, Fire Science, Journalism. Psychology, Sociology, Anthropology, Geography, Education, Political Science and Legal Technology, alternative testing is and will be available for all students upon request. Not only are students

provided with additional test time, readers can be made available, and the testing office can assist students with conventional testing procedures. Student class participation can be modified to meet the special needs of all students.

37. Describe the steps that will be taken to ensure the availability of auxiliary aids for use, as required, by students with impaired sensory, manual, or speaking skills. Discuss what services are available from the State Vocational Rehabilitation agency or other sources, and how additional aids will be made available if they are necessary. Discuss also the process whereby a student requiring an auxiliary aid would arrange for its provision.

The following auxiliary support services are available for hearing impaired students:

The Preparatory Program prepares students academically for freshman level college work, assists students in development of good study habits and introduces students to the mainstreamed calss structure. All remedial classes in the program are self-contained. The only freshman level courses offered in self-contained classes are career exploration and planning, and reading acceleration. The students, when placed in the preparatory program, are encouraged to carry full-time loads. Students schedule one or two courses which are part of their curriculum and selected for career program which gives the student an opportunity to experience the major of his choice.

Tutorial services assist the hearing impaired student who shares the class with hearing peers in the course of study. The average hearing impaired individual is two to five years behind in language development than their average hearing peers.

The three functions of tutors are to provide study skills, assist with course vocabulary, concepts and contents; and to re-teach the course to the extent possible when necessary.

Interpreter services are available to provide effective and fulfilling educational experiences for all hearing impaired students accepted into the Harper College Hearing Impaired Program by closing the communication gap. The interpreters practice total communication--use of finger spelling, sign language, speech, speech reading, reading and writing.

Notetaking services provide notes for the hearing impaired student and helps bridge the communication gap, along with the interpreter service. This service enables hearing impaired students to keep their eyes on the interpreter, instructor, and chalkboard while the notetaker records the information.

A counselor with a speciality in deaf education who counsels hearing impaired students in areas of vocational, academic, personal and social. The counselor is classified as faculty and is part of the

Harper counseling staff.

Job placement assistance is available to assist Harper Hearing Impaired Program graduates in locating satisfactory employment in cooperation with Harper's placement office, the Illinois Division of Vocational Rehabilitation, and the Coordinators of Harper Career Programs. The counselor also assists individual students in locating part-time jobs as a means to maintain their good financial standing in the community.

Housing Assistance is provided by the Hearing Impaired Program who assists new students in locating low cost residence. Periodically, a survey is taken for apartment information and lists are given to those requesting information.

Services available from the State Vocational Rehabilitation agency are dependent on the student's financial status and are evaluated on an individual basis. At the present time, Harper College has a grant from the Illinois Department of Vocational Rehabilitation to partially subsidize the total cost of the Hearing Impaired Program and also fund readers for visually impaired students.

Community resources are available for students to obtain taped books, and tape recorders may be checked out from the Learning Resource Center. The availability of other auxiliary aids for students with impaired sensory, manual or speaking skills will depend on those students requesting these aids. Students would request auxiliary aids and assistance from the designated college official.

38. All steps to be taken as a result of requirements related to academic adjustments should be the subject of individual Summary Report Forms.

Discuss the procedure to be followed and the schedule for developing individual Summary Report Forms for all steps to be taken and actions required as a result of this section on Academic Programs and Adjustments.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

HEW Regulations (84.43)

The Self-Evaluation

39. To make certain that discrimination (or the potential for discrimination) on the basis of handicap does not exist, describe steps that will be taken to review all materials, documents, or agreements related to student programs, activities, and services, including those related to academic programs, research, occupational training, housing, health, insurance, counseling, financial aid, physical education, athletics, recreation, transportation, other extracurricular activities, and any other post-secondary education program or activity.

The administrators responsible for each student program, activity, and service will review the policies and procedures relative to complying with the requirements of section 504 and will prescribe the necessary action to be taken in each area that is not currently in compliance. Information on these programs is also included in the Section 504 self-evaluation according to each area.

40. List all policies, materials, documents and agreements, based on the review in the above item, that discriminate on the basis of handicap, or could have the effect of so discriminating. For each, describe steps that will be taken to modify such policies, materials, documents, and agreements.

The steps involved in modifying such policies will include target date(s) for compliance, personnel, labor, and expenses involved where applicable. These steps will be included in the Implementation Plan as necessary.

41. Are the food service facilities of the institution accessible to handicapped persons, and are the policies and contracts related to food service free of any discrimination based on handicap?

Yes_____ No__X__

If "no", discuss steps that will be taken to ensure full participation and equal opportunity for handicapped persons in the institution's food service programs. Make certain that any specific modifications required are incorporated in the Transition Plan.

The following steps will be taken to insure full participation and equal opportunity for handicapped person's in Harper food

service facilities:

I. Faculty Dining Room
   A. Dining room area remodeling is in the planning stage which will include telephone access.
   B. Trays are available for persons in wheelchairs to obtain food from the buffet line.
   C. Staff will be instructed on needs of handicapped and are available to provide assistance.

II. Cafeteria
   A. Serving area will be remodeled to provide space for lowering presently inaccessible service items.
   B. Floors will be maintained as often as possible to alleviate slippery areas.
   C. The acquisition of a walking cart to hold trays for persons with ambulatory problems or confined to wheelchairs will be investigated.

42. For all social or recreational programs or services for students, analyze the policies and practices related to such services, communications methods for informing students of activities, and the facilities in which they take place (e.g., lecture halls, theaters, athletic facilities, student unions). (Note: This analysis should not include the activities of campus social or recreational organizations, which are covered in the section on "Nonacademic Services" to follow.) Based on this analysis, discuss steps that will be taken to ensure nondiscrimination in all social or recreational programs or activities provided to students.

Social and recreational programs, activities, and services will be advertised in different media, including newspapers, bulletin boards, activity calendars and radio announcements; they will be made available to all students and will occur in facilities which are accessible to all students; and if they are planned in meetings, the meeting rooms will be accessible to all students.

43. List all programs, activities and services that are not operated wholly by the institution and, for each, identify the providers of such "outside" programs, activities, or services. Among the areas to be reviewed for identification of "outside" providers are housing, health, insurance, counseling, financial aid, physical education, athletics, recreation, transportation, programs of training or work experience, employment opportunities, and research.

There are no programs, activities, or services within Student Services that are not operated wholly by the institution.

44. For each of those "outside" programs or activities listed in the above item, either: (A) discuss how equal opportunities, as a whole, exist for handicapped persons in the specific program or activity; or (B) discuss steps that will be taken to ensure that equal opportunities, as a whole, will exist in the specific program or activity.

There are no programs, activities, or services within Student Services that are not operated wholly by the institution.

45. Have grievance procedures been established that will allow students to file complaints with the institution on matters related to Section 504? (Note: Such procedures should apply to all student programs, activities and services covered in this chapter. However, it should be pointed out that grievance procedures need not apply to complaints from applicants for admission.)

Yes X No

Students can file complaints with the institution on matters related to Section 504 within the existing institutional student grievance policy which follows. Students are informed periodically of these procedures by publications such as the Harbinger, catalog, Student Handbook and the Harper radio station.

Student Grievance and Complaint Procedure

The purpose of this document is to insure the Harper student(s) an opportunity to express his or her concern or opinion regarding his or her relationship with the college. Broadly defined, the terms "grievance" and "complaint" are used synonymously and are interpreted as:

> A claim by a student, group of students, or the Student Senate that alleged improper, unfair, arbitrary, or discriminatory judgments or improper use of procedures have been applied to them directly by the college or a college representative.
>
> This claim may apply to any college policy, procedure, or interaction affecting the student directly. The claim may relate to an interpretation or application of a policy or procedure, but is not limited to policy and procedures.

Procedures for Recourse

Informal Process: The student(s) must present his or her case informally to the party involved, and request review and re-evaluation with the party. If satisfaction is not reached, the student(s) may enter into the formal process. If the student has a question about the informal process he or she can request clarification from the Dean of Student Services.

Formal Process:

Step I Secure the complaint procedures and Form Step I from the Dean of Student Services. If the informal process has been attempted and verified and twenty (20) days have not elapsed since the knowledge of the event giving rise to the complaint, the Dean of Student Services will sign Form Step I and issue the Complaint Form to the student(s). Verification will take place by the Dean of Student Services by contacting the staff member involved. If twenty (20) days have elapsed the Dean of Student Services will assist the student to continue the informal process.

Step II The student(s) shall submit (or indicate the attempt to submit) within five (5) days of the receipt of the Complaint Form, the completed form to the Dean of Student Services. The form must set forth the nature of the complaint, the facts on which it is based, the alleged violation, and the relief requested. The Dean of Student Services will send Form Step II with a copy of the Complaint Form to Staff Member #1.

Staff Member #1 will sign Form Step II and return it to the Dean of Student Services and shall discuss the complaint on campus (unless mutually agreed upon) within five (5) days with the student(s) at a time mutually agreeable to both parties. If at this meeting a settlement is reached, it shall be reduced to writing and signed by Staff Member #1 and the student(s) and a copy forwarded to the Dean of Student Services. The student(s) must then come to the Dean of Student Services' office to sign Part B of Form Step II.

If at the meeting no agreement is reached, Staff Member #1 shall give written answer to the student(s) within five (5) days, with a copy sent to the Dean of Student Services. If the student(s) still does not agree with the resolution, the student(s) may, within five (5) days, come to the Dean of Student Services' office and sign Part C of Form Step II.

Step III (Parts a, b, and c)

If the student(s) signs Part C of Form Step II, the Dean of Student Services will forward the Complaint Form and all related correspondence to the person on the college campus to whom Staff Member #1 reports (Staff Member #2).

Staff Member #2 shall discuss the complaint with the student(s) within five (5) days at a time mutually agreeable to both parties. If at this meeting a settlement is reached, it shall be reduced to writing and signed by Staff Member #2 and the student(s) with a copy sent to Staff Member #1 and the Dean of Student Services. The student(s) must then come to the Dean of Student Services' office and sign Part B of Form Step IIIa.

If no agreement is reached, Staff Member #2 shall give written answer to the student(s) within five (5) days, with a copy sent to Staff Member #1 and to the Dean of Student Services.

If the student(s) disagrees with the proposed solution, the procedure followed in Step IIIa is repeated through the Vice Presidents' level (Part IIIc).

If a resolution is still not reached at the Vice Presidents' level, the student(s) may proceed to the President's level by coming to the Dean of Student Services' office within five (5) days and signing Part C of Form Step IIIc.

Step IV

If the student(s) signs Part C of Form Step IIIc, the Dean of Student Services will send a copy of the Complaint and all related materials to the College President. The President shall, within ten(10) days, discuss the complaint with the student(s) at a mutually agreed upon time. If at the meeting a settlement is reached, it shall be reduced to writing, signed by the President and the student(s), and forwarded to the Dean of Student Services. The student(s) may, within five (5) days, go to the Dean of Student Services' office and sign Part C of Form IV.

Step V

If the student(s) signs Part C of Form Step IV, the Dean of Student Services will forward all appropriate materials to the Chairperson of the Board of Trustees. The decision of the Board of Trustees shall be final and binding.

Ad Hoc Review Committee

Following the submission of the formal Student Complaint, either party may request an Ad Hoc Review Committee be formed to review the complaint and propose a resolution. The two parties will mutually agree upon the number of members and the time of the first meeting. Each party will be responsible for notifying their members. The committee will choose its own chairperson and set its own ground rules. A reasonable completion date should be agreed upon by the two parties.

Following receipt of the committee's proposed resolution, the two parties will proceed with Step II of the procedure.

Definitions

Days: In all instances the term "days" does NOT include:
1. Saturdays
2. Sundays
3. Holidays
4. Breaks in the academic year
5. Winter term
6. Summer term

Time Limits:

1. If a complaint is not presented within the established time limits, it shall be considered waived.
2. If a complaint is not appealed to the next step within the established time limits, it shall be considered settled on the basis of the last answer.
3. If a college staff member does not answer a complaint within the established time limits, the student(s) may treat the complaint as denied at that step, and may appeal the complaint to the next step.
4. The time limits for any step may be extended by mutual agreement.

NOTE: The student complaint document does not give the supervisor the right to alter a grade.

46. All steps to be taken as a result of requirements related to the treatment of students should be the subject of individual Summary Report Forms.

Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken or actions required as a result of this section on the Treatment of Students.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

Transportation

The Self-Evaluation

47. List all policies and practices of the institution related to student transportation, including the use of automobiles by students, student parking, or those dealing with the use of campus vehicles.

Harper College provides ten parking lots for students and three lots for faculty and staff.

Students may purchase a parking sticker for $2.50 a semester if they wish to drive a car to campus, and may park in any student lot convenient to their classes. Students may not park in any staff, administration, visitor, dental, or medical parking lots. They also may not park in any area posted "No Parking" or stated as "No Parking" in the parking procedures.

48. For each policy and practice listed above, discuss either: (A) how the policy or practice does not discriminate against handicapped persons; or (b) steps that will be taken to modify the policy or practice to ensure nondiscrimination in the future. In cases where an institution provides parking space for its students, discuss the accessibility of such parking space for students with mobility impairments.)

Medical permits are available, upon application, for any person who is temporarily or permanently handicapped. This permit allows the recipient to park in any of the five medical/handicapped lots or in any other lot that may be more convenient to a building for them. Route signs are being installed from the medical parking lots to direct the handicapped person to the buildings by the route with the fewest obstacles. Curb ramps, handrails, and rest stops along with additional handicapped lots, are scheduled for installation Summer 1978 to further assist the handicapped person.

At this time, the college has no vehicles with special equipment available for handicapped persons, but the college vehicles are equipped with CB radios to communicate with any student, especially the handicapped, who may need assistance.

49. List all programs, activities, or services of the institution for which transportation for students is provided, including specific courses of study and social, recreational or other activities.

Participation in certain student organizations may provide opportunities for travel, in which case transportation is provided by the activity. Some travel programs are arranged by the Student Activities Office, via plane or bus. Clubs, organizations, classes or other groups may receive student activity fee funding for special trips (primarily by bus). A leased maxi-wagon is available for club or organization use. Other academic activities have been referred to in a prior portion of the Self-Evaluation.

For each of those programs, activities, or services listed above, discuss either: (A) how equal opportunities exist for handicapped persons; or (B) the steps that will be taken to ensure equal opportunities in the future.

Discuss also steps that will be taken to ensure that all students (including those with sight or hearing impairments) are informed of the transportation services that the institution provides for its students.

For programs, activities and services listed in the previous item, any group for which transportation may be provided is open to all students, and it shall not be restricted on the basis of handicap.

If a mobility-impaired handicapped student wants to participate in a specified activity, the transportation arranged shall be accessible to them.

The leased maxi-wagon is accessible to all students and the interior is easily modified to accomodate students with mobility impairments.

Transportation programs and services will be advertised in different media, including newspapers, bulletin boards and radio announcements.

50. Make certain that transportation programs, activities or services not wholly operated by the institution were treated in questions found in the section on "Treatment of Students".

All student services are wholly operated by the institution.

51. All steps to be taken as a result of requirements related to student transportation should be the subject of individual Summary Report Forms.

Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken or actions required as a result of this section on Transportation.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

Health and Insurance

The Self-Evaluation

53. Describe all health services or programs offered to students by the institution.

Health services offered to students by Harper College are as follows:

First aid
Treatment for minor illnesses, including non-prescription medications such as cold capsules, tylenol, aspirin, cough medication, Maalox, Kaopectate, etc.
Immunizations: tetanus toxoid, flu vaccine for college community
Allergy injections
Health counseling
Referrals to medical resources and community agencies
Blood pressure monitoring
Health education information: pamphlets, brochures
Rest area
Medical withdrawals from courses because of illness
Medical parking authorizations
Student accident and sickness insurance plan
Receipt, screening and delivery of emergency messages
Testing:

- Mononucleosis Spot
- Pregnancy
- Throat Culture
- Tuberculin Skin Test
- Urinalysis
- Venereal Disease Screening

Medical care by part-time physician
Physical examinations:

- Athletic eligibility - 2nd year
- Career program eligibility - 2nd year
- Student employment

54. For each service or program contained above, discuss either: (A) how the service or program does not discriminate against handicapped persons; or (B) steps that will be taken to modify the service or program to ensure nondiscrimination in the future.

All health services and programs are accessible for handicapped persons.

A video tape describing available health services is shown in the classroom every semester. This tape is accompanied by audio narration for the visually impaired and by simultaneous interpretation by an interpreter filmed on the tape. Brochures are also available.

55. Discuss the general physical accessibility of facilities utilized for student health services, and make certain that specific steps necessary to achieve accessibility are included in the Transition Plan.

    Health services are accessible to handicapped students and a grab bar is being installed in one health service bathroom to accomodate handicapped persons.

56. List and briefly describe all health or insurance policies or plans offered to students by the institution.

    An optional accident and sickness insurance policy is offered by the institution to its students. A brochure is attached.

57. For each policy or plan listed above, discuss either: (A) how the policy or plan does not discriminate against handicapped persons; or (B) steps that will be taken to modify or discontinue the policies or plans to ensure nondiscrimination in the future.

    The policy does not discriminate against handicapped persons.

58. Discuss steps that will be taken to make certain that all students (including those with sight or hearing impairments) are informed regularly of the institution's health services for students.

    The steps being taken to inform students of the institution's health services are outlined in the second paragraph above.

59. Make certain that health and insurance programs and services not operated wholly by the institution were treated in the section on "Treatment of Students"

    All health and insurance programs for students are operated wholly by the institution.

60. All steps to be taken as a result of requirements related to health and insurance should be the subject of individual Summary Report Forms.

    Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken and actions required as a result of this section on Health and Insurance.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

84.45 Housing.

(a) *Housing provided by the recipient.* A recipient that provides housing to its nonhandicapped students shall provide comparable, convenient, and accessible housing to handicapped students at the same cost as to others. At the end of the transition period provided for in Subpart C, such housing shall be available in sufficient quantity and variety so that the scope of handicapped students' choice of living accommodations is, as a whole, comparable to that of nonhandicapped students.

(b) *Other housing.* A recipient that assists any agency, organization, or person in making housing available to any of its students shall take such action as may be necessary to assure itself that such housing is, as a whole, made available in a manner that does not result in discrimination on the basis of handicap.

HEW Regulations (84.45)

Housing

61. Does the institution provide housing to its students?

Yes_____ No___X_____

84.46 Financial and employment assistance to students.

(a) *Provision of financial assistance.* (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not (i), on the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit elegibility for assistance, or otherwise discriminate or (ii) assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.

(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap.

(b) *Assistance in making available outside employment.* A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate Subpart B if they were provided by the recipient.

(c) *Employment of students by recipients.* A recipient that employs any of its students may not do so in a manner that violates Subpart B.

HEW Regulations (84.46)

Financial and employment assistance to students.

62. List and discuss briefly the various forms of financial assistance that the institution provides (or assists others to provide) to students at both the undergraduate and graduate levels.

Harper College is a community college offering undergraduate courses to students. The following financial aid programs are available and there is no discrimination based on handicap.

A. Basic Educational Opportunity Grant: grants based on need, granted to undergraduates only.
B. Illinois State Scholarship Monetary Award: Scholarship for tuition only based on need, to Illinois residents, undergraduates only.
C. Supplemental Educational Opportunity Grant: grant based on exceptional need, for undergraduates only.
D. College Work Study Program: Employment to students who need to earn money to pay part of their educational expenses.
E. National Direct Student Loans: loans repayable after student has completed school at 3% interest.
F. Law Enforcement Education Program: grants are for full-time Criminal Justice personnel only.
G. Nursing Scholarships: The purpose of this federally funded program is to assist nursing students with exceptional financial need who require such assistance to pursue their course of study.
H. Nursing Loans: These loans are available to nursing students who are pursuing an associate degree in nursing at Harper College.
I. Prisoner of War-Missing in Action.
J. Grants for children of Illinois policemen and firemen killed in line of duty.
K. Grants for Illinois National Guard or Illinois Naval Militia enlisted members.
L. Dependents of Correctional Workers Grant Benefits.
M. Social Security Benefits: Students up to age 22 who have a retired, disabled or deceased parent and who continue their education on a full-time basis at any accredited school, college, or university should consult their local social security office about financial educational benefits.

N. Division of Vocational Rehabilitation: This program exists to assist disabled individuals in returning to or preparing for productive activity.
O. Trustee Scholarships: The Board of Trustees of William Rainey Harper College authorizes a series of tuition scholarships each year to graduates within Community College District #512.
P. Comprehensive Employment and Training Act: offers funding for students in career/vocational programs which can be completed in one year.
Q. Veteran Benefits:
    1. G.I. Bill
    2. Illinois State Veterans Scholarship
    3. Dependent's Educational Assistance
    4. Widow's or Wife's Educational Assistance
    5. Disabled Veteran's Vocational Rehabilitation
    6. Army Contract Rebates
    7. V.A. Workstudy
R. Illinois Guaranteed Loan Program
S. Short-term Loans: loans are available to students each semester for tuition, fees, and a maximum of $50 for books and supplies, the total not to exceed $300.
T. Dental Hygiene Loans: James R. Carroll Dental Hygiene Student Loan Fund was established by the Northwest Dental Study Club and provides no interest/no service charge loans to dental hygiene students.
U. Harper College Student Service Awards: Service awards are granted to students in leadership positions on campus.
V. Private Scholarships: Each year new scholarships are available, some on a continuing basis.

63. For each form of financial aid listed above, discuss either: (A) how no discrimination based on handicap exists in the form of aid; or (B) steps that will be taken to ensure that no discrimination will exist in the future.

Harper College is a community college offering undergraduate courses to students. The financial aid programs listed above are available and there is no discrimination based on handicap.

64. Does the institution administer or assist in the administration of scholarships, fellowships or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap?

Yes_____ No___X_____

65. Discuss steps that will be taken to ensure that all policies, practices, application materials, forms, and other documents or information related to financial aid are free from discrimination based on handicap and include the institution's statement of commitment to section 504. Describe also assistance that may be provided to handicapped students applying for financial aid, as may be required in individual instances.

Any handicapped student would be eligible to apply for all types of financial assistance available at Harper College. No student would be denied help on the basis of his/her handicap. Assistance in preparation of all financial aid forms is available for all students in the Office of Financial Aid. An interpreter is available for hearing impaired students if assistance is needed.

Financial Aid Programs are publicized through the booklet The Student's Guide to Financial Aid at Harper College and will include Harper College's commitment to compliance with section 504. This is as follows: "Harper College is in compliance with Section 504 of the Rehabilitation Act of 1973 which states that: "No otherwise qualified handicapped individual in the United States...shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be usbjected to discrimination under any program or activity receiving Federal financial assistance."

66. Discuss all facilities (e.g., financial aid office) that are used in the process of providing financial aid to students, and any modifications in such facilities that may be required to ensure that handicapped students are not limited in their financial assistance opportunities. Make certain that specific modifications required to achieve accessibility are incorporated in the Transition Plan.

The Financial Aids Office is completely accessible to the handicapped. Information and assistance is available during registration periods and these areas are also accessible for handicapped persons.

67. Discuss the methods by which financial assistance and employment assistance programs are communicated to students (and applicants), and steps that will be taken to ensure that all students (including those with sight or hearing impairments) have equal opportunities in the competition for financial and employment assistance. Consider communications related to application deadlines.

Students may receive information on financial aid by the following means:

A. Walk-in requests at Financial Aids Office.
B. Financial Aids Office presently contacts students that identify need for financial aid on admissions form by letter. In the future, a brochure will be sent to these persons describing the Financial Aids program.
C. Private scholarships are advertised in the Harbinger.
D. The Financial Aid Specialist has attended high school college nights to explain financial aid opportunities.
E. The Financial Aid specialist is present at orientation meetings, open house for nurses, etc., to explain program.
F. Posters are placed on Harper bulletin boards on available financial aid.
G. High school counselors are to inform students regarding financial aid, and are provided with information.
H. Additional scholarships and grants are publicized in the Harbinger as they become available.

Employment assistance programs are communicated to students by the following:

A. College catalogs carry placement information and describe the programs.
B. Orientation video tapes present a student vignette on Placement Services.
C. Flyers answering questions of who, when, where, how, and why are distributed at orientation and throughout the year.
D. Bulletin boards throughout the institution carry placement bulletins and flyers.
E. Special work listing bulletins in the Placement Center and in the College Center carry recruitment dates and placement information.
F. All counselors and co-ordinators receive placement information special memos, and bulltins and this includes the co-ordinator and counselor of the Hearing Impaired program.
G. Special information for the hearing impaired is referred directly to the counselor and co-ordinator of the Hearing Impaired program.

68. Describe the ways, if any, that the institution assists students in obtaining employment while in school, during summer vacations, and after graduation. Discuss steps that will be taken to ensure an absence of discrimination based on handicap in all such assistance, including additional methods that may be required to inform handicapped persons of such opportunities.

The Harper College Placement Center provides a direct hook-up to the Illinois Job Service where there are specialists who work with handicapped. Each Job Service office has someone

assigned. A provision is made for the Job Service to have a representative on campus Wednesday evenings so interested parties may meet directly with them. The Placement Center also refers students to the Division of Vocational Rehabilitation Office for assistance.

In some cases the staff of the Placement Center have driven handicapped to interviews with prospective employers. Special contacts and provisions have been made to help place handicapped.

All services for job placement are planned with handicapped in mind. Equal opportunity employer lists are maintained and the job service microfiche lists those employers who hire handicapped. Full-time, part-time, and summer employment, as well as employment on campus, is publicized by the Placement Center for all students equally. Information is sent to the coordinators and counselors of the Hearing Impaired program.

69. Describe the facilities that are used in the process through which the institution assists in making employment opportunities available to its students. Discuss any steps that may be required to ensure that all students have equal access to such employment opportunities without regard to handicap. Make certain that specific modifications required to achieve accessibility are incorporated in the Transition Plan.

Placement facilities are spacious and on a ground floor location. There is easy access to the center and an elevator is available between floors in the building. Ramps without stairs are provided for those in wheelchairs, and elevators have braille markings.

70. Discuss the steps that must be taken to ensure that all principles of nondiscrimination in employment (as covered in Chapter Four of this Guide) are applied to student employees as well.

All Affirmative Action, Equal Employment Opportunity, Title VII, Title IX, and section 504 provisions are a basic part of the philosophy and objectives of the Harper College Placement and Career Development Center.

All steps to be taken as a result of requirements related to financial and employment assistance should be the subject of individual Summary Report Forms.

71. Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken and actions required as a result of this section on Financial and Employment Assistance.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

84.47 Nonacademic services.

(a) *Physical education and athletics.* (1) In providing physical education courses and athletics and similar programs and activities to any of its students, a recipient to which this subpart applies may not discriminate on the basis of handicap. A recipient that offers physical education courses or that operates or sponsors intercollegiate, club, or intramural athletics shall provide to qualified handicapped students an equal opportunity for participation in these activities.

(2) A recipient may offer to handicapped students physical education and athletic activities that are separate or different only if separation or differentiation is consistent with the requirements of 84.43 (d) and only if no qualified handicapped student is denied the opportunity to compete for teams or to participate in courses that are not separate or different.

(b) *Counseling and placement services.* A recipient to which this subpart applies that provides personal, academic, or vocational counseling, guidance, or placement services to its students shall provide these services without discrimination on the basis of handicap. The recipient shall ensure that qualified handicapped students are not counseled toward more restrictive career objectives than are nonhandicapped students with similar interests and abilities. This requirement does not preclude a recipient from providing factual information about licensing and certification requirements that may present obstacles to handicapped persons in their pursuit of particular careers.

(c) *Social organizations.* A recipient that provides significant assistance to fraternities, sororities, or similar organizations shall assure itself that the membership practices of such organizations do not permit discrimination otherwise prohibited by this subpart.

HEW Regulations (84.47)

Nonacademic services

72. List and describe briefly any physical education, intercollegiate athletics, club athletics, or intramural athletics programs that are offered by the institution to its students.

A. Physical Education Pre-Professional Program: this program offers the student the opportunity to attain an associate in science degree in physical education. Fourteen (14) courses are included in this course of study.
B. Physical Education Activity Courses: Credit courses are available to all students and are transferable to senior colleges and universities. Thirteen (13) activity courses are included in the curriculum.
C. Intercollegiate Athletic Program: Intercollegiate competition is offered in 14 sports. Nine sports are available for men and 5 sports are offered for women.
D. Intramural Athletics: Intramural sport activities are offered based on student interest. Normally 10-15 different activities are offered each year.

73. Based on an analysis of the policies, procedures, and practices related to each, for each program listed in the above section, discuss either: (A) how the program is free from discrimination based on handicap, with or without the option of separate or different programs; or (B) steps that will be taken to ensure equal opportunity in the future.

A. There are no existing policies related to any of the above mentioned programs which in effect discriminate against the handicapped person or on the other hand assure the availability of these programs to the handicapped; therefore, it can be assumed that each program is available to the handicapped person on the same basis as it is available to any other person.
B. In the future, steps will be taken to identify specific policies and procedures to ensure opportunities for the handicapped, including special programs and entry provisions into appropriate programs.

74. Discuss any health examinations that are required of all students prior to participation in physical education or athletics. Describe steps that will be taken to make certain that such examinations measure health conditions related to the participation, and do not exclude handicapped persons based on unrelated criteria.

Physical examinations are required for all athletes involved in intercollegiate athletics as specified by the National Junior College Athletic Association requirements. The results of these examinations performed by a physician are screened by the professional staff of the Health Service to determine eligibility for competition based on health conditions required for the specific sport.

75. Discuss steps that will be taken to communicate to students (including those with sight or hearing impairments) the availability of separate or different physical education or athletics programs for handicapped persons, if they wish to participate in such.

At the present time separate or different physical education or athletics programs do not exist for handicapped persons. Handicapped persons are encouraged to participate as they are able and with adaptations as necessary in the present athletic program. As separate and different programs are made available to the handicapped persons, this information will be included in all materials that describe the physical education, athletic, and intramural programs, and distributed to all students.

76. Describe safeguards that will ensure that a qualified handicapped athlete will not be discriminated against in his or her participation in physical education or athletics programs that are not separate or different.

Such safeguards will develop from policies and procedures that will require standards for particular activities within the physical education and athletic programs. These standards will in effect allow for participation by the handicapped person as the person is able and as adaptations are made.

77. Does the institution require as a prerequisite to attaining a degree that students complete some requirement regarding physical education or athletics?

Yes_____ No__X__

78. Discuss the accessibility of athletics facilities for persons with mobility impairments, and steps that may be necessary to achieve accessibility and full participation for such individuals.

The present athletic facilities are located in temporary quarters on campus and at extension center locations and are not completely accessible for handicapped persons. Adaptations in class schedules are made on request of handicapped students and efforts are made to achieve full participation for the handicapped.

The permanent physical education facility and/or the physical fitness center is scheduled for completion January 1979. This facility has been designed to be completely accessible for the handicapped and the facility has been planned with special accommodations for handicapped persons. Accessibility to the outdoor athletic facilities will also be improved upon completion of the new structure.

79. List and briefly describe any programs of personal counseling, academic counseling, vocational counseling, guidance counseling, or placement services that the institution provides to its students.

The college offers the following services:

A. Personal counseling: students who have personal/social concerns or problems associated with stress or crisis situations or problems in clarifying values or goals, are assisted by professional staff.
B. Academic counseling: staff are available to assist students who need assistance in planning their courses and programs or who want information and/or assistance concerning transferring to a four-year school. College bulletins from most United States schools are available for use by students.
C. Vocational counseling: students are provided assistance in selecting a career and in determining how their interests and abilities relate to careers.

80. For each program or service listed above, and based on a review of the policies and practices that govern each program or service, discuss either: (A) how the program or service is free from discrimination based on handicap; or (B) steps that wil be taken to ensure nondiscrimination in the future.

All services are available and accessible to students and prospective students regardless of handicap. One counselor is trained to communicate with hearing impaired students. Interreters are available for students to see a counselor of their choice.

81. Describe briefly the facilities that are used in providing the programs or services listed above, and discuss steps that may be necessary to ensure full participation in such programs and services by handicapped persons. Make certain that specific modifications required to achieve accessibility are incorporated in the Transition Plan.

The offices for all members of the Counseling Staff are physically accessible to students. The central Counseling Office is also accessible and staff provide assistance as needed for handicapped persons.

82. Discuss steps that will be taken to inform counseling, guidance and placement personnel (and all other persons in a position to counsel students) of the institution's commitment to Section 504, of the specific prohibitions against discrimination contained in Section 504, and of the prohibition against counseling handicapped students toward restrictive careers. List those classes of persons (in addition to professionals in counseling, guidance, or placement) who will receive such information, including faculty members, residence halls supervisors, and so forth.

Academic advising is the responsibility of a staff of professional counselors. Annual inservice programs will be held to inform the counseling staff of the requirements of Section 504 and of the prohibitions against discrimination and against counseling handicapped students toward restrictive careers.

83. Discuss steps that will be taken to ensure that all students (including those with sight or hearing disabilities) are informed periodically of the institution's counseling, guidance, and placement programs.

The availability of counseling and placement services for students is described in the college catalog, newspaper schedule, and student handbook. In addition, a newsletter is sent to all students each semester. Announcements regarding services are made on the college radio station.

84. List those organizations, such as fraternities, sororities, and clubs, that receive significant assistance from the institution.

Formally recognized clubs whose membership is open to any currently enrolled Harper student are awarded a $100 annual grant from the student activity fund. At present there are sixteen clubs receiving this assistance:

A. Association of Legal Students
B. Catholic Campus Ministry

C. Circle K
D. Collegiate Illinois Association of the Deaf
E. Electronics Club
F. Future Secretaries Association
G. Geology Club
H. Astronomy Club
I. Chess Club
J. Intramural Sports Board
K. Operating Room Technicians Club
L. Physical Education Majors Club
M. Political Science Club
N. Solar Energy Club
O. Sophmore Nurses Club
P. Ski Club

85. For each organization listed above, discuss either: (A) how the organization does not discriminate in its membership practices against handicapped students; (B) steps that will be taken to ensure nondiscrimination in the future; or (C) steps that will be taken to withdraw the institution's assistance of the organization.

Student groups are not considered for approval of recognition and/or funding unless they are open to all students without respect to race, creed, sex, national origin or handicap. Exceptions may be made for religious qualifications if the organization's aims are primarily sectarian. Club constitutions will be reviewed annually to ascertain that membership practices are not discriminatory. Clubs who do not follow nondiscriminatory practices will no longer be recognized by the institution and funding will be withdrawn.

86. Discuss the procedure that will be used periodically to inform organizations that receive assistance from the institution of prohibitions against discrimination based on handicap in membership practices.

Any group petitioning for recognition will be informed of the criteria for recognition. In addition, a student activity's policy and procedure manual will be supplied annually to each club and its faculty adviser which will explicitly state that membership practices of clubs must not discriminate on the basis of handicap.

All steps to be taken as a result of requirements related to nonacademic services should be the subject of individual Summary Report Forms.

87. Discuss the procedure to be followed and the schedule for developing Summary Report Forms for all steps to be taken and actions required as a result of this section on Non-Academic Services.

The Summary Report Form(s) pertaining to this section are found in the Implementation Section of this report which follows the Self-Evaluation. Each form is referenced to the appropriate item in the Self-Evaluation.

EXHIBIT VIII-G
November 9, 1978

FOR BOARD ACTION

SUBJECT

Institutional Plan for Compliance With Section 504 of the Rehabilitation Act of 1973

REASON FOR CONSIDERATION

Section 504 of the Rehabilitation Act of 1973 mandates equal opportunity for qualified handicapped persons in educational programs and activities of all recipients of federal financial assistance. Through the format of self-evaluation, the college was required to evaluate all policies and practices and their effects on handicapped persons to determine the nature and extent of discrimination present and to modify such policies or practices as necessary to remove discrimination and achieve equal access and opportunity. This has been completed, evaluated by a community review panel, and is now presented for approval.

BACKGROUND INFORMATION

Section 504 was signed into law May 3, 1977. Since that time educational institutions receiving federal assistance have been required to complete certain specified activities. Harper College has complied with the legislation by appointing a compliance officer, adopting a policy statement on non-discrimination, adopting grievance procedures, ensuring that new construction conforms to ANSI standards and that auxiliary aids are available in the classroom, and submitting to HEW an assurance pledging compliance with the requirements. In addition, the college has made programs and activities accessible, with the exception of structural modifications that may be required, has made initial modifications regarding the institution's commitment to non-discrimination, and has completed a transition plan for changes in facilities to achieve accessibility.

The transition plan, self-evaluation, implementation schedule, and results of the community survey are found in the attached document.

RECOMMENDATION

That the Board of Trustees approve the plan for institutional compliance with Section 504 of the Rehabilitation Act of 1973.

I am impressed by the in-depth description of Harper's compliance with 504 requirements.

Your report demonstrates a determined effort to comply with Section 504. I hope the number of handicapped students able to attend Harper will increase and your efforts will be rewarded.

The report displays considerable effort to not only meet the mandates, but the spirit of the law.

It is difficult to add any recommendations to this most complete document. Harper is to be commended for their compliance with Section 504.

No comments.

I feel the transition plan for implementation of Section 504 of the Rehabilitation Act of 1973 at Harper College has been successful in its evaluation and procedures of adaptation. The report shows concern for correct procedure in compliance with the law in respect to Section 504. This was an excellent job.

This is an excellent, comprehensive report! When fully implemented it will be of great benefit to the present and future students and employees at Harper College who may be afflicted with a handicap.

Sensitivity to the needs of the hearing impaired and the visually and physically handicapped is excellent. There appears to be, however, a lack of services provided for the population for whom our organization was formed, the learning disabled.

Our recommendation would be that each applicant identified as learning disabled be considered on a totally individual basis, with emphasis on I.Q., aptitudes, interest, and motivation as the basis for meeting requirements for acceptance. Testing and grading procedures should be appropriate to the strengths and deficits of the individual, and there should be flexibility in fulfilling requirements for completion of course work. We would like to see L.D. specialists available to assist students, along with alternative teaching devices where appropriate.

Item #23: It is stated "students with sight impairments will be notified verbally". Visually impaired students also need printed material. In most cases, students will be capable, with special aids, of reading the material.

Item #29: It is imperative faculty members are made aware of the specific aid available for visually impaired students. The faculty should not be expected to work in their respective divisions with inadequate information on the support services available to aid them in their instruction.

Item #30: Students should have a printed copy of the alternate methods available to them. They need to be made aware that the college's support services are adequate.

Item #37: A coordinator of handicapped services is extremely important. Visually impaired students function normally if there is a person who will take responsibility in assisting them with the college's support services. A coordinator would be in the position of implementing and disseminating the proper information to those students and faculty who need it. He would also be a valuable resource to possible students, new students, parents, administrators and all faculty personnel.

Overall, Harper should be very proud of their current situation and intended plans for improvement. Any suggestions made are to be considered in light of an already excellent program.

It seems much thought has gone into preparing this document and that Harper is making a sincere attempt to comply. As time passes, new barriers may be discovered as students with assorted handicaps attend. As I see the biggest problem is adequate proper parking, better cafeteria facilities, heavy doors with high thresholds, and steep ramp on north to F Building, east of C Building, and long steep walk to F Building from Lot I. Also, anyone without a CB could really be stranded in his car.

I had often thought a stairway, a ramp or lift, or something, would be great to enter F Building on the south through the first floor south truck entrance in the well, or whatever it is called, by Graphics. This would provide easy, quick access and avoid the long up-hill push from medical Lot 1 or up steep hill on north from E Building or A Building medical for a student driven to the campus. It is so cumbersome going through D Building and so many heavy doors and high thresholds in D Building.

Visually impaired students need as much help if not more in choosing a career than other handicapped students. Many job positions do not lend themselves to visual problems, on the otherhand, some job possibilities are not always obvious. Therefore, the DVR counselor for the visually impaired should be consulted in individual cases to help Harper personnel better counsel a visually impaired student in a particular field. The DVR counselor may be able to share insights as to the possibility or feasibility of a visually handicapped student involving himself in a particular career.

Explore possibility of "recruitment" of students to participate.

Wondered if there was any interest in a club for wheelchair students.

Very good.

3. The Implementation phase of Section 504 is outlined on the Summary Report forms at the conclusion of the document. Please rate these below:

   The Summary Report forms have adequately outlined areas of non-compliance and activities to be undertaken to achieve compliance.

   __8__ Strongly agree

   __5__ Agree

   _____ Undecided

   _____ Disagree

   _____ Strongly disagree

Please comment on any of the information found on the Summary Report forms.

I felt Harper has honestly endeavored to make a thorough review with the self-evaluation in compliance with Section 504. You have solicited community input and you have not skirted the issue.

The areas have been addressed honestly and weaknesses identified, with steps prescribed for future compliance.

Harper is to be commended for these efforts.

however, is almost impossible a situation for a mobility handicapped person.

Impressive.

5. This is not Harper's problem, but is a bigger problem for the community and the RTA to consider the needs of the handicapped in being transported to Harper.

   Could Nortran be contacted as to provision for handicapped and those provisions relayed to student body?

   Parking is very poor for wheelchair students. There never seems to be any space in the medical lot by A Building or Dental Hygiene. These areas are the only really close parking spots. Where are the additional promised spaces? Would be great if there was a bus for handicapped as at U of I and for lower grade levels in other districts. CB communication with Public Safety doesn't do much good if student doesn't own a CB.

   No buses are available at night. No special buses with chair lifts are available for the severely handicapped. Students practically have to own automobiles to get to Harper.

6. A specific ocular form should be obtained for college files. This, in many cases, may be available from the DVR counselor for the visually impaired. The student should be asked for such information since certain eye conditions may limit the students participation in physical activity. Also, some conditions are degenerative which is information of which the college should be aware.

   Impressive.

7. Wonder how employment service is. Hadn't had experience in this department.

   Well aware of IDVR supportitive services and I am worried about the next school year.

8. Harper has endeavored to find out the problems and make adaptations so that special education students would have necessary adjustment. Harper has also worked with local high schools to identify special education students planning to attend Harper and plan services accordingly.

There may also be a need for special course equipment adapted for the visually impaired. Although this need may be infrequent, the American Foundation for the Blind and the American Printing House for the Blind are good resources.

In conclusion, visually impaired students should be informed in writing of those academic adjustments made available to them in order that they may also take on the responsibility of their own educational needs.

Summary: Students with vision problems may need the following academic adjustments:

1. Large type or braille copies of tests and handouts. It is assumed textbooks are secured by the student with the help of the college.
2. Tests read to them with up to 1-1/2 times allowed if the tests are in print.
3. Xerox or mimeographed copies of material should be available to students through allowing instructors with visually impaired students priority to the equipment.
4. Special course equipment adapted for visually impaired students.

Provide training for adaptive teaching techniques for staff.

Noted with interest that field trips required for geology and astronomy courses may have an alternative educational experience. This had been a barrier.

Plan appears to cover, or plans to cover needs of handicapped.

Impressive.

4. There are efforts being made to avoid discrimination and to make these students an integrated part of the total program.

Materials to meet their needs should allow visually impaired students the same rights as other students. Before the decision is made that a course may be inappropriate because of a vision problem, students should be allowed to experience some of the work, perhaps the semester before, on an experimental basis.

Special procedures for adequate testing and evaluation as well as all around consideration seem to be adequate. The cafeteria

disabilities, educable mentally handicapped.

Seems reasonable.

All areas seem to have been thoroughly researched.

Plan appears to meet or exceed government requirements. Accessibility of satellite facilities will probably be upgraded as many of them are charged to meet their own requirements.

Since Harper buildings are practically new, only a few accessible corrections are needed.

2. There needs to be a stronger liaison with special education personnel in the area.

If printed material is available to explain explicit aid given to visually impaired students, it would greatly reduce their anxiety that accompanies a new situation, such as college.

Explore communicating with high school staff directing Special Education Programs.

Seems reasonable.

The plan and information, I can gather, shows real efforts are made to accommodate the needs of the handicapped.

Impressive

3. It is imperative that professors receive memos reminding them that academic adjustments may be needed. Although it is the responsibility of the student to communicate his needs, many times instructors may forget before presenting material because these students are doing so well. Students with vision problems will need academic adjustments in most cases. Ideally, in certain cases, tests and printed handouts should be reproduced in large type to ensure the vision problem is not a "handicapping condition". Tests may also be read to students, however this method is ineffective in those areas which require visual input to assimulate information and specific terms or professional language. Also, some visually impaired students, even braille readers, are visual learners, therefore, every attempt should be made to present materials in the appropriate visual manner when possible.

Those students who are able to function well with regular print should be supplied with Xerox copies or mimeographed copies of material. Accessibility to Xerox machine on a priority basis should be given to those professors with visually impaired students in their classes. Extra time may also be needed, up to 1-1/2 times, by students to complete written tests. This would be decided between the student and instructor.

2. The Self-Evaluation will become part of the institution's plan for compliance with Section 504. The information contained in the report has been supplied by the person responsible for each area. Please rate each area according to the compliance information provided. The areas are listed in the order found in the legislation.

		Rating			
		Very Good	Good	Average	Poor
1.	Program accessibility	5	8		
2.	Admissions and recruitment	7	6		
3.	Academic adjustments	6	7		
4.	Treatment of students	8	5		
5.	Transportation	5	4	2	2
6.	Health and insurance	9	4		
7.	Financial and employment assistance to students	8	4	1	
8.	Nonacademic services	6	5	2	

Please list any comments on the eight areas below:

1. There should be no problem with accessibility for visually impaired students. The exception may be a totally blind student or severely impaired student who may need instruction in orientation and mobility to learn the layout of the campus. This help may be obtained through the services for the Visually Impaired Office, State of Illinois in downtown Chicago.

   Emphasize other exceptional characteristics, i.e., learning

APPENDIX F

Section 504 Compliance Survey

William Rainey Harper College

Please rate the following items according to your knowledge of Harper College and its compliance with Section 504 of the Rehabilitation Act of 1973.

1. The Transition Plan for architectural changes for 1977-80 is inclusive of changes needed to promote access:

   7 Strongly agree

   6 Agree

   _____ Undecided

   _____ Disagree

   _____ Strongly disagree

Please list other areas of concern regarding architectural barriers.

Will all new buildings, including field house, be accessible? Primary concern regarding program adaptation in field house.

Lower towel and soap dispensers and light switches in bathrooms if too high.

Investigate floors as to how slippery they may be.

Investigate height of fire alarm. Are there plans for substitutes for bell system for hearing impaired?

Architectural barriers encountered have been designated last year and are included in this report.

Was the survey completed by a professional engineer or architect who is cognizant of the needs of the handicapped?

I have not been able to visit Harper and try accessibility personally. The plans reflect a real determination to provide accessibility within the limitations of the present structures. Schedule and location of program should be such that travel distances between classes, etc., will be as limited as possible and not require excessive travel effort.

APPENDIX E

September 18, 1978

Dear

Thank you for agreeing to assist Harper College in serving on the Community Review Committee to evaluate our plan for compliance with Section 504 of the Rehabilitation Act of 1973.

The enclosed document contains a copy of the legislation, the 1977-80 transition plan for architectural changes at Harper College, the self-evaluation of the college and the plan for implementing the changes for institutional compliance with Section 504.

Please read the information and complete the attached survey on the various areas. Your assistance will provide us with important information as we seek to comply with this legislation.

I would appreciate your returning the survey in the enclosed envelope by October 15, 1978. If you have any questions on any of the information found in the document, please contact me at 397-3000, Ext. 340.

Thank you again for volunteering your time to assist Harper College in evaluating its services for the handicapped members of our community.

Sincerely yours,

Elizabeth R. McKay
Director of Environmental Health

jl

Enclosure

Institutional Self-Evaluation

Summary Report Form

Item 86

Preliminary Information:

XV. 1. Noncompliance identified:

Present Student Activity Policy and Procedural Manual does not include a statement of nondiscrimination on the basis of handicap in reference to club membership practices.

2. Action to be taken:

Nondiscrimination statement will be included in manual.

3. Person responsible for completion:

Frank L. Borelli, Extension 243
Director, Student Activities

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

Inclusion in 1979-80 Manual

7. Projected impact on the institution:

Improved communication to all clubs and organizations. at the college.

Institutional Self-Evaluation

Summary Report Form

Item 65

Preliminary Information:

XIV. 1. Noncompliance identified:

Section 504 compliance commitment is not included in present information sent to students by Financial Aids Office.

2. Action to be taken:

Compliance statement will be included in The Student's Guide to Financial Aid at Harper College.

3. Person responsible for completion:

Carol Zack, Extension 248
Financial Aid Specialist

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

1978-79 Academic Year

7. Projected impact on the institution:

Improved information to all students.

Institutional Self-Evaluation

Summary Report Form

Item 55

Preliminary Information:

XIII. 1. Noncompliance identified:

Inaccessible bathroom in Health Service.

2. Action to be taken:

Grab bar to be installed in Health Service bathroom to achieve accessibility.

3. Elizabeth R. McKay, Extension 340
Director of Environmental Health

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

According to Transition Plan for 1977-78.

7. Projected impact on the institution:

Wheelchair persons will have access to a Health Service bathroom.

Institutional Self-Evaluation

Summary Report Form

Item 41

Preliminary Information:

XII. 1. Noncompliance identified:

Food service facilities partially inaccessible.

2. Action to be taken:

I. Faculty Dining Room
   a. Dining room area remodeling is in the planning stage which will include telephone access.
   b. Staff will be instructed on needs of handicapped and are available to provide assistance.

II. Cafeteria
   a. Serving area will be remodeled to provide space for lowering presently inaccessible service items.
   b. Floors will be maintained as often as possible to alleviate slippery areas.
   c. The acquisition of a walking cart to hold trays for persons with ambulatory problems or confined to wheelchairs will be investigated.

3. Person responsible for completion:

Cliff Wener, Extension 570
Director of Food Service

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

According to Transition Plan for 1977-78.

7. Projected impact on the institution:

Food service facilities will be accessible for all persons.

Institutional Self-Evaluation

Summary Report Form

Item 37

Preliminary Information:

XI. 1. Noncompliance identified:

College has not designated an official to coordinate handicapped students requests for assistance, auxiliary aids or other help.

2. Action to be taken:

Person will be appointed during 1978-79 year to serve as coordinator of handicapped services.

3. Person responsible for completion:

Guerin A. Fischer, Extension 360
Section 504 Compliance Officer

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

June 1, 1979

7. Projected impact on the institution:

Handicapped persons will be able to obtain coordinated assistance while attending Harper College.

6. Schedule for completion:

   Fall, Spring and Summer Semester

7. Projected impact on the institution:

   Handicapped students will be made aware of their right to support services. This awareness may increase requests for such services and increase institutional costs in providing same.

Institutional Self-Evaluation

Summary Report Form

Item 30

Preliminary Information:

X. 1. Noncompliance identified:

Complete information on Section 504 is not presently available to handicapped students.

2. Action to be taken:

Identified handicapped students will be informed every semester of modifications or adjustments that will be made for individual handicapped students including:

(A) that no one may be excluded from any course, or course of study, on account of handicap;
(B) that classes will be rescheduled for students with mobility impairments if they are scheduled for inaccessible classrooms;
(C) that academic degree or course requirements may be modified in certain instances to ensure full participation by handicapped students;
(D) that alternate methods of testing and evaluation are available in all courses offered by the institution for students with requirements for such methods;
(E) that auxiliary aids are made available by the institution for students with impaired sensory, manual, or speaking skills; and
(F) that certain campus rules and regulations may be waived if they limit the participation of handicapped students.

The preceding information will also be available in the Admissions, Special Services and Health Service offices.

3. Person responsible for completion:

Guerin A. Fischer, Extension 360
Section 504 Compliance Officer

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

Joann Powell, Extension 346
Dean of Student Development

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

Fall Semester 1978 - Memoranda
Fall Semester 1978 - Inservice program
Fall Semester 1979 - Procedural Manuals

7. Projected impact on the institution:

Administrators and faculty will be more cognizant of the requirements of Section 504.

Institutional Self-Evaluation

Summary Report Form

Item 29

Preliminary Information:

IX. 1. Noncompliance identified:

Incomplete information has been disseminated to all academic administrators and faculty members.

2. Action to be taken:

Memo will be sent to all administrators and faculty members Fall Semester 1978 specifying:

(a) whether or not there are any degree requirements or course requirements (including prerequisites) that discriminate on the basis of handicap or have the effect of so discriminating;
(b) the extent to which alternate testing processes are necessary to eliminate discrimination in testing and evaluation of student ability and achievement;
(c) those off-campus activities or excursions related to a course or a degree requirement that would require accommodation for students with mobility impairments;
(d) those off-campus programs (e.g., student teaching, internships) that are related as a whole, equal to those of non-handicapped students;
(e) policies or practices related to library or reading room use, special reading collections of a department, and reserved reading materials;
(f) practices related to professors' office hours, and any arrangements that may be required to offer students with mobility impairments equal access during office hours;
(g) policies and practices related to student participation in research; and
(h) inaccessible facilities that must be used by students.

Procedural Manuals for 1979-80 and all succeeding procedural manuals for full and part time faculty will also contain preceding information. Inservice program will be held Fall Semester for all counselors on handicapped career awareness.

3. Person responsible for completion:

David Williams, Extension 370
Vice President of Academic Affairs

4. Procedures to be followed:

   As described above.

5. Data or information required:

   As described above.

6. Schedule for completion:

   Every semester.

7. Projected impact on the institution:

   Improved information to applicants.

Institutional Self-Evaluation

Summary Report Form

Item 23

Preliminary Information:

VIII. 1. Noncompliance identified:

Incomplete information to applicants regarding institution's policies and practices regarding nondiscrimination based on handicap.

2. Action to be taken:

(1) The Director of College Relations will place the following statement in catalogs, handbooks, on forms, and in communications used in admission and recruitment:

> Harper College is in compliance with Section 504 of the Rehabilitation Act of 1973 which states that: "No otherwise qualified handicapped individual in the United States...shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

(2) Printed materials bearing the college policy on nondiscrimination will be distributed to the coordinator of the Hearing Impaired Program and brochures stating the policy will be available in the Admissions Office, Student Development (Counseling) Office, and in student lounges.

(3) Prospective students with hearing impairments will receive the nondiscrimination statement in printed form accompanied by information on specific aid which will be available to the handicapped student.

(4) Prospective students with sight impairments will be notified verbally by Admissions and/or Student Development personnel of the college policy and will be apprised of specific aid available to students with sight impairments.

(5) College switchboard operators will be apprised of the college policy and will respond appropriately to telephone inquiries regarding the college policy.

(6) Information regarding the college policy of nondiscrimination will be distributed to area helath care organizations and societies.

3. Person responsible for completion:

Elaine Stoermer, Extension 279
Director of College Relations

Institutional Self-Evaluation

Summary Report Form

Item 22

Preliminary Information:

VII. 1. Noncompliance identified:

Lack of knowledge of admissions and recruitment personnel regarding Section 504.

2. Action to be taken:

Inservice program for these persons.

3. Person responsible for completion:

Dorn Stansbury, Extension 304
Director, Admissions and Registrar

4. Procedures to be followed:

Program to be conducted before visitations to high schools begin.

5. Data or information required:

Fall Semester

6. Schedule for completion:

Fall Semester

7. Projected impact on the institution:

Improved information to potential students regarding accessibility.

Institutional Self-Evaluation

Summary Report Form

Item 21

Preliminary Information:

VI. 1. Noncompliance identified:

Lack of communication to all academic administrators and department chairpersons relating to admission requirements.

2. Action to be taken:

Memos to be sent every semester communicating these procedures.

3. Person responsible for completion:

Donn Stansbury, Extension 304
Director, Admissions and Registrar

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

First week of Fall, Spring and Summer semesters.

7. Projected impact on the institution:

Increased information to above persons.

Institutional Self-Evaluation

Summary Report Form

Item 19

Preliminary Information:

V. 1. Noncompliance identified:

Post admission inquiries have not been made regarding handicap accommodation.

2. Action to be taken:

The health form will be revised to include voluntary responses of this nature and follow-up correspondance will take place with the student informing the person of the available services.

3. Person responsible for completion:

Elizabeth R. McKay, Extension 340
Director of Environmental Health

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

November 1, 1978

7. Projected impact on the institution:

Health forms will have to be reprinted and distributed at a cost to the college. Approximately 750 mailings per semester will also mean an additional cost to the institution.

Institutional Self-Evaluation

Summary Report Form

Item 13

Preliminary Information:

IV. 1. Noncompliance identified:

Comparisons have not been done between predictive index items collected in Fall 1976 and those persons completing career course requirements, June 1977 and June 1978.

2. Action to be taken:

Comparisons to be made as outlined.

3. Person responsible for completion:

Donn Stansbury, Extension 304
Director, Admissions and Registrar

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above for appropriate career programs.

6. Schedule for completion:

October 1, 1978.

7. Projected impact on the institution:

Information may relate to future use of these criteria in career programs and admission requirements.

Institutional Self-Evaluation

Summary Report Form

Item 5

Preliminary Information:

II. 1. Noncompliance identified:

Student information regarding accessibility standards inadequate.

2. Action to be taken:

A. Publication of the standards will be found in the following locations:
   1. Annually in the Student Handbook.
   2. Biannually in the Harbinger, the college newspaper.

B. The name and office number of the responsible campus official would also be listed in the Handbook and Harbinger.

C. Directory including the existence and location of accessible services, activities and facilities would be printed in above publications.

D. Individual directory handouts will be available in the campus official's office and in the Admissions Office.

3. Person responsible for completion:

Frank Borelli, Extension 243
Director of Student Activities

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

1978-79 school year, June 1, 1979.

7. Projected impact on the institution:

Students will be better informed of their rights.

Institutional Self-Evaluation

Summary Report Form

Item 5

Preliminary Information:

III. 1. Noncompliance identified:

Inadequate information on Section 504 to employees.

2. Action to be taken:

A. Memoranda will be sent to all employees informing them of institution's compliance with Section 504 definition of handicapped persons as defined in the legislation.
B. The Staff Policy and Procedures Manual will contain the following:
   1. A statement on institutional compliance and a definition of handicapped.
   2. Established accessibility standards including a current campus plan of physical accessibility.
   3. Name of the campus officer responsible for institutional compliance.
C. The Classified Employee Council will be made aware of institutional compliance including areas of noncompliance and remediation.

3. Person responsible for completion:

James Smith, Extension 216
Acting Director of Personnel

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

Memoranda, September 1, 1978; 1979 Manual; Council Awareness, September 1, 1978.

7. Projected impact on the institution:

College staff will be more aware of the institution's commitment to the handicapped.

Institutional Self-Evaluation

Summary Report Form

Item 3

Preliminary Information:

I. 1. Noncompliance identified:

Inaccessible extension centers.

2. Action to be taken:

a. Survey will be taken by September 1, 1978 to determine accessibility.
b. All future programs and activities of the college will be held in locations which are accessible.
c. Future programs and activities formerly held in extension locations which are not found to be accessible according to the survey will be made available at another location.
d. Any locations not in compliance will be noted in the college publications of the programs and activities and an alternative location will be identified.

3. Person responsible for completion:

William Howard, Extension 548
Director of Community Services

4. Procedures to be followed:

As described above.

5. Data or information required:

As described above.

6. Schedule for completion:

September 1, 1978

7. Projected impact on the institution:

College may have difficulty contracting with community extension centers because of inaccessible facilities. Staff will have to be cognizant that one section of all courses offered must be scheduled in an accessible location.

APPENDIX D

Implementation

The following Summary Report Forms are as a result of the data collected in the self-evaluation. They have been compiled according to the guidelines from the Office of Civil Rights. These forms have been designed to ensure that the following steps are taken related to any action required:

1. that someone is designated as responsible for completion of the action;
2. that procedures to be followed are outlined;
3. that data or information required will be identified;
4. that a schedule for completion will be agreed upon;
5. that records are maintained; and
6. that progress is monitored. (Biehl-1978)

The fifteen summary report forms are referenced by item number to the appropriate source in the self-evaluation.